

1. Executive Summary

The Mary River Project (the Project) is an advanced iron ore exploration Project located in north Baffin Island, Qikiqtani Region of Nunavut. The Project is wholly owned by Canadian mining company Baffinland Iron Mines Corporation (Baffinland). Baffinland has released a Preliminary Feasibility Study demonstrating the robust potential of full-scale development and has initiated the regulatory approval process for full-scale development. Programs and activities are designed to support exploration and advancing the Project to full-scale development.

The Preliminary Mine Closure and Reclamation Plan has been updated from the Preliminary Closure Plan presented in Volume 10, Appendix 10G of the FEIS in accordance with all applicable requirements including the Qikiqtani Inuit Association (QIA) Abandonment and Reclamation Policy for Inuit Owned Lands and commitments made by Baffinland during the October 2011 technical meetings with stakeholders and government. This Preliminary Mine Closure and Reclamation Plan addresses all Project-related activity areas and infrastructure related to the Mary River Project and provides a cost estimate for the final mine closure.

Project related facilities were designed and constructed to minimize the footprint and where possible and practical, facilities were designed to be temporary in nature. These design and construction considerations have facilitated reclamation plans and minimized the engineering required to support the complete decommissioning and reclamation of the site.

Three abandonment scenarios have been described in this Preliminary Mine Closure and Reclamation Plan: short-term temporary mine closure, long-term temporary mine closure and final mine closure. Additionally, progressive reclamation measures have been proposed to facilitate temporary and final mine closures.

Short-term temporary closure is the planned shutdown of a mine site for a period of less than one year. All facilities would be secured, an inventory of all hydrocarbon products, chemicals, hazardous wastes and explosives would be carried out and all effluents would be monitored. Hazardous waste and explosives would be removed from the site. Personnel necessary, including environmental personnel, to meet closure criteria would remain on site.

Long-Term Closure is the state of inactivity resulting from economic considerations or a reduction in ore reserves for a period greater than one year. During Long-Term Closure the Project sites will be maintained in a secure condition. Site personnel will conduct general inspections periodically. They will maintain a record of these inspections. Although protective measures will be in place the Project will no longer be monitored by on site personnel maintaining a full time presence on the Project.

Final closure and reclamation will occur when the ore deposit is exhausted and the mine ceases operations without the intent to resume mining activities in the future. Final closure and reclamation will include removing all infrastructures, equipment and materials either off-site or into an on-site landfill, the Mine Pit or quarries (for inert, non-hazardous, non-combustible materials), contouring ground surfaces as required to maintain stability and to mimic the natural surrounding topography and re-establishing natural drainage patterns. Arrangements will be made with a sealift contractor to collect materials and equipment at Milne Inlet and Steensby Inlet and ship material destined for offsite transport. The airstrips will be abandoned, but left in good working order unless otherwise directed by regulatory agencies, to provide emergency/rescue landing spots for regional aircraft and access for post closure monitoring.

The final closure and reclamation activities are expected to last a period of three (3) years. Post closure monitoring will continue until closure objectives have been achieved as shown by monitoring results. These activities are periodic. Monitoring and follow-up inspections will be conducted to assess the physical and chemical stability of various components after closure and reclamation of the facilities. Environmental monitoring and follow-up inspections will assess the ongoing effectiveness of the reclamation.

The Mining RECLAIM spreadsheet provided by Aboriginal Affairs and Northern Development Canada (AANDC) (formerly Department of Indian Affairs and Northern Development) has been used as the basis for the preliminary estimate of the financial cost of final closure and reclamation measures. It addresses Project-related activity areas and infrastructure related to the Mary River Project, mobilization and post-closure monitoring. The financial cost obtained is based on the information available at the time of publishing and will require to be updated as the Project progresses. The cost estimate also follows the QIA Abandonment and Reclamation policy guiding principles and stated assumptions.

2. Introduction

Baffinland Iron Mines Corporation (Baffinland) proposes to develop an open-pit iron ore mine in north Baffin Island, Nunavut Territory (Figure 1-1: Location Map). The Mary River Project (the Project) is currently in an advanced iron ore exploration phase with operations located in north Baffin Island, Qikiqtani Region of Nunavut. The Project is wholly owned by Canadian mining company Baffinland Iron Mines Corporation (Baffinland). Planned Project activities include the design, mobilisation, construction, operation, on-going (progressive) reclamation and eventual closure of an open-pit mine and associated infrastructure for the extraction, transportation and shipment of iron ore.

The basis of the Mary River Project is production and shipment of 18 million tonnes per annum (Mt/a) of high grade iron ore after crushing and screening, that do not require additional processing. Iron ore will be extracted from Deposit No. 1, located in the Qikiqtani Region of Nunavut. Reserves consist of approximately 365 Mt of direct shipping iron ore at an average grade of 64.66 %. Deposit

No. 1 alone has resources capable of meeting the production design of 18 Mt/a for 21 years of operation. Ore will be transported by rail from the mine site to a new port at Steensby Inlet and loaded on ore carriers year round.

Baffinland is committed to developing the Project in an environmentally and socially sustainable manner that will benefit the Company and the people of Nunavut. To that end, Baffinland has released a Preliminary Feasibility Study demonstrating the robust potential of full-scale development and has initiated the regulatory approval process for full-scale development with the release of a draft Environmental Impact Statement (EIS). Technical review of the DEIS with implicated stakeholders has been completed and a Final EIS is scheduled to be submitted in early 2012. A pre-development (mobilisation) works program has been developed to prepare the way for initiation of construction activities in 2013 for the mining operation assuming that the necessary permits, leases and authorisations have been granted.

2.1 Conceptual Mine Closure and Reclamation Plan for the Project

A Mine Closure and Reclamation Plan (MC&RP) contains and describes the studies and plans related to closure and reclamation of a mine site and its related mine facilities. The MC&RP should address the physical stability, chemical stability and future land use of each component of the mine. Participation of local communities and other stakeholders in the consideration of alternative reclamation activities to safeguard community values is encouraged. Baffinland has committed to establish an advisory group focused on reclamation of the Project that will allow for local community input and involvement. Reclamation will be consistent with locally valued ecosystem components and regional planning objectives. All closure work will be carried out in accordance with permit requirements as stated in the Territorial Land Use Regulations.

The most recent AANDC guidelines envisage three primary stages in the development of a MC&RP¹: a Preliminary, an Interim and a Final Mine Closure and Reclamation Plan. After submission of the Final MC&RP the subsequent post closure documents report reclamation activities undertaken and compares the planned objectives performance against that which has actually been achieved.

A Preliminary MC&RP is prepared during mine planning and permitting prior to the actual construction of the mine and is based on conceptual design level plans and to some degree on assumed future conditions. The purpose of the Preliminary plan is to outline how the mine site and associated facilities are proposed to be reclaimed and identify the possible residual risks to human health and the environment.

The first Interim MC&RP is prepared in advance of the commencement of mining activities and on a scheduled basis thereafter to document any closure planning deviations or improved knowledge. The purpose of the Interim plan is to update the earlier closure plan according to the current mine

¹ Mine Site Reclamation Guidelines for the Northwest Territories, AANDC Renewable Resources & Environment (January 2007).

operating plans, changes to community values, advances in location specific mine reclamation technology and achievements of the progressive reclamation activities undertaken to date.

The Final MC&RP is prepared in advance of the scheduled permanent closure and cessation of mining activities. The purpose of the Final MC&RP is to provide complete details at an “issued for construction” level of the remaining reclamation activities and post closure monitoring programs.

2.2 Preliminary Mine Closure and Reclamation Plan

This Preliminary Mine Closure and Reclamation Plan has been prepared for Baffinland in support of the regulatory approval process, including the Final Environmental Impact Statement (FEIS) for the Project, and is based on currently available Project design information which is at a conceptual design level. This document assumes that the reader has access to and is familiar with the EIS content.

The purpose of this document is to provide an initial Preliminary mine closure and reclamation plan for the Mary River Project, at a conceptual level, in accordance with the regulatory framework established by the Inuit, Federal and Territorial governments.

As the Project is developed through the regulatory and detailed design phases, the Project may undergo some design changes from the conceptual level information currently available and this preliminary mine closure and reclamation working document will require refinement and updating. However, it is anticipated that the major Project components will not change. In accordance with the applicable guidelines and regulations the Preliminary Mine Closure and Reclamation Plans presented herein does not constitute a complete or Final Closure Plan, it is to be considered a 'living document' to be updated throughout the life of the Project. Updates will refine and elaborate all specific targets and commitments to reaching these targets.

Baffinland is committed to, and will be responsible for, carrying out the closure and rehabilitation measures in a phased, on-going (progressive) manner as reviewed and agreed with the regulatory agencies and implicated communities.

The Qikiqtani Inuit Association (QIA) Abandonment and Reclamation Policy for Inuit Owned Lands (2009), Aboriginal Affairs and Northern Development Canada (AANDC) Mine Site Reclamation Guidelines for the Northwest Territories (2007), as well as the Territorial Land Use Regulations have guided the development of this Preliminary Mine Closure and Reclamation Plan for the Project. Baffinland has committed to establish an advisory group focused on reclamation of the Project that will allow for local community input and involvement including consultation with local Community Land and Resources Committee(s). In addition, the Mine Site Reclamation Policy for Nunavut (AANDC, 2002a) and the Mine Site Reclamation Policy for the Northwest Territories (AANDC, 2002b) require that contingency measures be established in the Closure and Reclamation Plan for both Temporary Closure and Long Term Closure of a mine site. Baffinland intends to adhere to these

policies, guidelines and associated regulations. Table 1-1 lists all policies, guidelines and associated regulations that Baffinland will adhere to.

Table 1-1: Applicable Mine Closure Planning Policies, Guidelines, and Lease Requirements

Title	Source
Commercial Lease No.: QIOC3001	(QIA 2010)
Guidelines for the Preparation of an Environmental Impact Statement for Baffinland Iron Mines Corporation's Mary River Project (NIRB File No. 08MN053)	(NIRB 2009)
Abandonment and Reclamation Policy for Inuit Owned Lands, Department of Lands and Resources	(QIA 2009)
Mine Site Reclamation Guidelines for the Northwest Territories	(AANDC 2007)
Mine Site Reclamation Policy for Nunavut	(AANDC 2002)
Mine Site Reclamation Policy for the Northwest Territories	(AANDC 2002a)
Guidelines for Abandonment and Restoration Planning for Mines in the Northwest Territories	(NWTWB 1990)

NIRB - Nunavut Impact Review Board

QIA - Qikiqtani Inuit Association

AANDC - Aboriginal Affairs and Northern Development Canada (formerly INAC - Indian and Northern Affairs Canada)

NWTWB - Northwest Territories Water Board

This Preliminary Mine Closure and Reclamation Plan has been prepared to address the above requirements as well as incorporate applicable Mine Closure and Reclamation feedback received from the DEIS technical reviewers. The plan incorporates concurrent and on-going progressive rehabilitation during the course of the Project to limit the work required after cessation of operations and to limit the environmental effects during the Project life. It addresses care, maintenance and monitoring considerations from potential temporary short and long-term disruption of mining activities as well as final cessation of operations. Public health and safety and environmental considerations will be incorporated throughout all stages of progressive rehabilitation, closure and post-closure monitoring.

A Glossary of Terms, Acronyms and Abbreviations used throughout this document and the applicable guidelines and regulations can be found in section 14.

2.3 Other relevant EHS changes to be incorporated prior to Mining Operations

In accordance with the regulations, six months prior to commencing mining operations Baffinland will submit an Interim Mine Closure and Reclamation Plan.

It is anticipated that the detailed Environmental Health and Safety criteria which are currently being updated to reflect the advancement of the Project design will be available. Finalization of these design criteria and development of implementation programs will be used to refine the Interim Mine Closure and Reclamation Plan prior to commencement of mining operations. The EHS systems

documents, as presented in Volume 10 of the FEIS will be updated prior to the commencement of mining operations and the submission of the Interim Closure Plan. These documents include:

- Environmental Design Guidelines used for the Mary River Project which enabled the design team to avoid major impacts on the identified Valued Ecosystem Components VECs and Valued Socio-Economic Components VSECs. Detailed environmental design criteria will be presented in the FEIS;
- Environmental Protection Plan (EPP) which regroups detailed procedures and standards for the execution of field activities which will optimize environmental protection; many of the procedures and instruction developed at the exploration phase will be retained throughout the Life of the Project, as exploration is an on-going activity, and, the established procedures are relevant for all phases of the Project;
- Outline of the Company's Hazard Identification and Risk Assessment (Appendix 10A-2), based on OSHA 18001 principle. Emergency Response and Spill Contingency Plan; as per the other management plans, the Emergency Response and Spill Contingency Plan is a Life of Project Plan which is updated regularly to accommodate the level of activities on the Mary River Project sites;
- Purpose and content of the environment monitoring and mitigation plans (EMMPs). The EMMPs outline the specific mitigation measures applied to ensure minimal adverse impacts on the VECs; these EMMPs are "living documents" which are updated regularly in the context of the principle of "continuous improvement". They apply from the onset of exploration activities through to pre-development, construction, operation and the closure phase of the Project. As the Project advances in its "life cycle", the roles and responsibilities changes to reflect the degree of activities on the various sites. Monitoring activities (selection of indicators, targets and thresholds) as well as mitigation measures are also adjusted through adaptive management, if required, on the basis of monitoring information gathered and evaluation of effects;
- Outline of the health and safety management plan (developed on the basis of OSHA 18001 guidelines);
- Outline of the Project's stakeholders engagement plan (developed in the context of ISO Standard 26000:2010 related to Guidance for Social Responsibility);
- Outline of the human resources management plan; the plan will be updated on the basis of the requirement of IIBA, once negotiations have concluded;
- Reporting and documentation requirements for all environmental management plans as outlined in Baffinland's EHS Framework (Appendix 10-A); and
- Process of management review and adaptive changes, which is outlined in Appendix 10A-1, and is applicable to all management plans.

In addition, the FEIS will include the documentation required for the application of a Type A water license. All of the Project environmental management plans are subjected to audit and annual management reviews to ensure that the policies, procedures and mechanisms put in place lead to the

achievement of stated performance goals and objectives. Several of these management plans will be updated to reflect the advancement in Project design as well as the construction activities. A summary of the various plans, the expected review date, or expected date of implementation will be presented in Volume 10 of the FEIS.

2.4 Preliminary MC&RP Goals and Objectives

Over the life of the Project it is expected that techniques and methodology for mine site reclamation will continue to evolve with changes to our understanding of the Project site, stakeholder's views and technologies for cost effective and practical reclamation in northern conditions. Planning for the mine site reclamation will be risk based and remain dynamic in order to take into account results of on-going studies and identified best practices for the site specific conditions as this knowledge base is expanded.

The Project is being designed with closure and reclamation considerations in mind in compliance with the Baffinland Sustainable Development Policy.² The main objectives of this policy and the above guidelines and regulations are to:

- Apply the principles of pollution prevention and continuous improvement to minimize ecosystem impacts, and facilitate biodiversity conservation;
- Use energy resources, raw materials and natural resources efficiently and effectively;
- Engage with governments, employees, local communities and the public to create a shared understanding of closure and reclamation issues and take their views into consideration in making decisions;
- Return the Project affected and viable sites (Milne Port, Mine Site, Railway right of way, Quarries and Steensby Port) to "wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and human activities"³;
- Undertake reclamation of affected areas as soon as practical in an on-going and progressive manner to reduce the environmental risk and advance environmental protection;
- Provide for the reclamation of affected sites and areas to a stable and safe condition and restore altered water courses to near their original alignment and cross-section. Where practical, affected areas will be returned to a state compatible with the original undisturbed area;
- Reduce the need for long-term monitoring and maintenance by eliminating perpetual care requirements; and,
- Provide for mine closure using the current available proven technologies in a manner consistent with sustainable development.

² Baffinland Iron Mines Corporation, Sustainable Development Policy (September 2011).

³ Natural Resources Canada. *The Whitehorse Mining Initiative Leadership Council Accord Final Report* (October 1994).

In accordance with the above objectives the main goals of the Preliminary Closure Plan are to:

- Establish a working group to consider reclamation options drawing from Inuit knowledge and arctic experiences of similar mining and use of decommissioned facilities for alternative uses;
- Provide for the long term physical and chemical stability of the Project areas so as to protect the public health and safety and ecosystem integrity;
- Promote and enhance natural revegetation and recovery of disturbed areas that is compatible with the surrounding natural environment and to allow for the future use by people and wildlife;
- Implement reclamation in a progressive on-going manner during the life of the Project and restore sites as soon as an area is no-longer required to limit the need for long term maintenance and monitoring; and,
- Reduce residual environmental effects once operations have ceased through final closure measures that are technically and economically feasible.

The list of major Project components in the Closure Plan will be updated to be consistent with the FEIS, and up to date with current planning.

Specific criteria are listed for reclamation scenario's in Section 10 of this document. They are consistent with the AADNC 2007 Guidelines and will be revised and improved as the Project develops.

2.5 Technical Certificates

This update to the 2010 Preliminary Closure Plan document was prepared by professionals of Hatch Ltd and other members of the Baffinland Mary River Project team.

2.5.1 Certification

John Binns, M.Sc., P.Eng. – Environment Manager

Mr. Binns is a senior environmental engineer in Hatch's mining practice. He started his long career originally as an underground Mining Engineer with experience in gold and copper mines. He has broad experience in mineral exploration including mining geophysics, as well as extensive international experience in environmental management including mine closure, mine water management, Acid Rock Drainage, Environmental Management Systems (EMS), and EMS auditing.

Michael Nutter, M.Sc. – Mine Closure and Reclamation Planning

Mr. Nutter is a senior environmental specialist in Hatch's Vancouver office, where he is the Regional Lead for the Hatch Western Canada Sustainable Development in Design Practice. He has 33 years of experience in the management of diversified international multi-discipline Projects and studies within an engineering environment. Mr. Nutter has undertaken social and environmental

assessments; due diligence auditing; and, incorporated sustainability considerations into infrastructure, mining and metals Projects.

Jim Millard, M. Sc., P.Geo – Senior Reviewer

Mr. Millard is a Senior Environmental Superintendent for Baffinland Iron Mines Corporation for the Mary River Project. He has 20 years of environmental mining practice including the areas of mine closure, environmental site assessment, aquatic effects, water quality, waste water treatment, and acid rock drainage.

3. Project Information

3.1 Proponent Name and Address

The proponent of this Preliminary Mine Closure and Reclamation Plan is:

Baffinland Iron Mines Corporation
120 Adelaide St. West, Suite 1016
Toronto, ON M5H 1T1
Tel: (416) 364-8820 Fax: (416) 364-0193

3.2 Project Description and Site Plans

A summary Project description is provided below along with location drawings for each of the major Project sites identifying when components are planned to be reclaimed.

3.2.1 Project Description

The Project description for the operating phase is described in Volume 3, section 3 of the FEIS.

The Mine Site is located approximately 160 kilometres (km) south of Pond Inlet (Mittimatalik) and approximately 1,000 km northwest of Iqaluit. The Project sites are shown on Figure 1-1: Location Map. The Major Project Components are listed in Table 2-1.

The Project plan calls for a railway to be constructed that will connect the Mine Site at Mary River to a newly constructed Port in Steensby Inlet on the south-western coast of Baffin Island. For the construction period, material, equipment and supplies required for the installation of needed facilities at the Mine Site and the northern portion of the railway will be received via Milne Port. Goods received at Milne Port will be transported to the work sites via the existing Tote Road which requires limited upgrading. Likewise, construction materials for the new port in Steensby Inlet and the southern portion of the railway will be received at the Steensby Port location.

During the construction phase of the Project, the majority of the construction material and supplies, fuel and mining equipment will be received at Milne Port and Steensby Port during the open-water season August to October. A floating dock will be located at Milne Port to facilitate the off-loading of construction materials, equipment and supplies. Once the Railway is operational, Milne Port will only be used occasionally for the delivery of oversized equipment to the Mine Site. It is expected that the Steensby Port facilities and the Railway will take four years to construct. Upon Railway operation, 18 Mt/a of iron ore will be transported by rail and transferred to ore carrier vessels at from Steensby Port for shipment to international markets. Shipping of ore will occur year round and will require vessels with icebreaking capabilities.

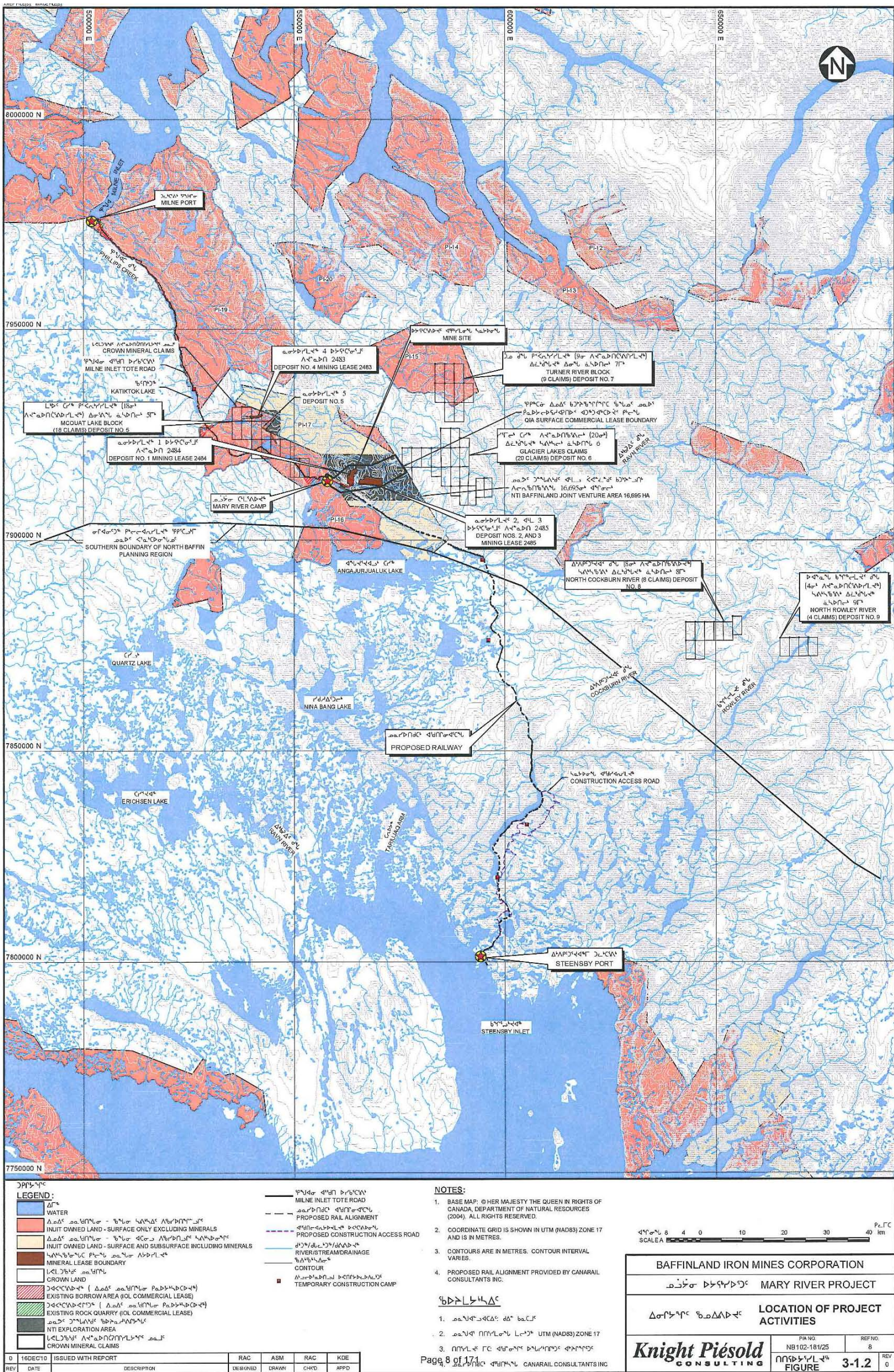


Figure 1-1: Location Map

Table 3-1: Major Project Components

Milne Port	
Temporary Facilities	Permanent Facilities
<ul style="list-style-type: none"> • Bulk fuel storage facilities (fuel bladders; to be decommissioned by Year 1) • Mobile gensets 	<ul style="list-style-type: none"> • Beach laydown area for sea-lift unloading • Laydown areas (existing) • Airstrip (existing) • Waste management facilities • Quarries and borrow sources (existing) • Camp facilities (existing and upgraded) • Water supply (existing and upgraded) • Mobile gensets • Bulk fuel tank farm • Explosives storage • Communication systems • Floating Dock
Milne Inlet Tote Road	
Temporary Facilities	Permanent Facilities
<ul style="list-style-type: none"> • Construction camp • Stand-alone generators as required • Quarries and borrow sources • Explosives magazines 	<ul style="list-style-type: none"> • Milne Inlet Tote Road (existing and upgraded) • Quarries and borrow sources (existing) • Communication towers • Emergency shelters
Mine Site	
Temporary Facilities	Permanent Facilities
<ul style="list-style-type: none"> • Construction camp • Contractor offices • Quarries and borrow sites • Temporary fuel storage (iso-containers) • Aggregate crusher and stockpiles • Concrete batching plants • Temporary power generators • Portable lighting plants • Construction workshops and maintenance shops • Warehouses/stores 	<ul style="list-style-type: none"> • Ore crushing and screening facilities • Ore stockpiling facilities • Railway loading and unloading facilities • Truck loading and unloading facilities • Equipment maintenance facilities • Permanent worker accommodations • Communication systems • Site roads • Laydown areas • Airstrip (existing and upgraded) and facilities • Bulk fuel storage and distribution facilities • Explosives manufacturing and storage • Water supply • Power generation • Waste management facilities • Explosives plant

Railway	
Temporary Facilities	Permanent Facilities
<ul style="list-style-type: none"> • Construction access roads • Quarries and borrow sources • Construction camps (4) and airstrips • Refuelling depots at camps • Explosives magazines 	<ul style="list-style-type: none"> • Railway embankment • Train loading and unloading facilities • Communication systems • Tunnels, bridges • Rail sidings • Quarry for ongoing railway ballast during operations (also used in construction)
Steensby Port	
Temporary Facilities	Permanent Facilities
<ul style="list-style-type: none"> • Construction docks (2) • Quarry • Concrete batch plant(s) • Construction workshops and maintenance shops • Warehouses/stores • Temporary power generators • Portable lighting plants • Laydown areas/freight storage • Parking areas for construction fleet • Temporary fuel storage (iso-containers) • Construction Equipment maintenance facilities • Explosives plant and magazines 	<ul style="list-style-type: none"> • Steensby Island Causeway • Ore stockpiling facilities • Ore and freight docks • Ore crushing and screening • Ship loading and unloading facilities • Cargo (container) handling facilities • Permanent worker accommodations • Rail shops and maintenance infrastructure • Maintenance facilities • Buildings and offices • Communication systems • Site roads • Laydown areas/freight storage • Airstrip and related access road • Bulk fuel storage and distribution facilities • Water supply facilities • Waste management facilities • Power plant • Navigational aids (shipping lane and port)

3.2.2 Site Plans

The proposed Mine Site, Milne Port and Steensby Port, connecting infrastructure and principal camp locations site plans are shown on the series of drawings in Appendix A. Project components that are planned to be reclaimed following the construction phase are quantified separately as are components that are contained on Inuit Owned Land. These drawings should be consulted when reviewing the remaining sections of this report.

Table 3-2: Preliminary Mine Closure and Reclamation Plan Drawings

Drawing Number	Drawing Title
H337697-7000-07-012-0001	Preliminary Mine Closure and Reclamation Plan - Milne Inlet
H337697-4210-07-012-0001	Preliminary Mine Closure and Reclamation Plan – Mine Site Construction Phase
H337697-4210-07-012-0002	Preliminary Mine Closure and Reclamation Plan - Mine Site Final Closure Phase
H337697-0000-07-126-0014	Preliminary Mine Closure and Reclamation Plan – Tote Road
H337697-2000-07-012-0001	Preliminary Mine Closure and Reclamation Plan – Railway Alignment
H337697-7000-07-012-0002	Preliminary Mine Closure and Reclamation Plan - Ravn River Rail Camp
H337697-7000-07-012-0003	Preliminary Mine Closure and Reclamation Plan – North Cockburn Camp - Tunnels
H337697-7000-07-012-0004	Preliminary Mine Closure and Reclamation Plan - South Cockburn Lake Rail Camp
H337697-4510-07-012-0001	Preliminary Mine Closure and Reclamation Plan - Steensby Port Construction Phase
H337697-4510-07-012-0002	Preliminary Mine Closure and Reclamation Plan - Steensby Port Final Closure Phase

3.3 Inuit Owned Lands

The Mine Site and Milne Port locations and a portion of the railway alignment are situated within the Qikiqtani region and are located on Inuit Owned Lands (IOL) that are important to the local community for both cultural and heritage purposes. The IOL surrounding the Project area are shown on the reference drawings for the Mine Site, Milne Inlet and Railway alignment. The surface lease to the Project is held by Baffinland and is leased from the Qikiqtani Inuit Association (QIA). In accordance with this and future surface leases held with the QIA, this Preliminary Mine Closure and Reclamation Plan incorporates the guidelines developed for the Qikiqtani lands entitled the Abandonment and Reclamation Policy for Inuit Owned Lands (QIA 2010). The guiding principles of the Abandonment and Reclamation Policy require that all disturbed IOL be returned to a safe and stable condition capable of supporting human and wildlife needs consistent to social and cultural needs of the Inuit for the undisturbed lands within that area. The QIA guidelines used for the Preliminary Mine Closure and Reclamation Plan are summarized in Appendix C.

Milne Port and Mine Site are entirely located on Inuit Owned Land. The first 25 km of the railway and access roads are located on Inuit Owned Land; the remaining sections are located on Crown land.

4. Current Project Site Conditions

Since the discovery of the ore deposit in 1962, there have been a number of exploration campaigns as described in Volume 3, Section 1.2 of the FEIS. Since 2007, Baffinland has provided annual reports to the Nunavut Impact Review Board (NIRB) summarizing the site work completed, and the work planned for the following year for the exploration activities previously screened and approved by NIRB. These reports also provide a synopsis of compliance performance with explorations licences, permits, approvals and commitments, and includes the results of monitoring activities. An update on the existing environmental conditions and progressive reclamation activities are also contained in these reports. The reports are publicly available through NIRB (<http://www.nirb.ca/>).

5. Progressive Rehabilitation

In accordance with the objectives and guidelines presented in Chapter 1.0, progressive rehabilitation will be implemented to reduce the risk to the environment.

In addition to progressive closure activities, observations during operations to identify best practices for promoting natural re-vegetation of disturbed areas will occur and may be incorporated into updates of the Mine Closure and Reclamation Plan. In addition, the experience from closure of the Nanisivik and Polaris mine sites, which are in a similar climate zone, will be used as references.

5.1 Proposed Progressive Rehabilitation

This section describes the proposed rehabilitation measures that will be progressively completed during the construction and/or operation phases of the mine.

The overall intent of the Preliminary Closure Plan is to achieve Baffinland's desire of restoring the existing conditions of the Mine Site, Milne Port and Steensby Port during operation as practicable and on closure, so that areas affected by the proposed Project activities and to a lesser extent the historic exploration, bulk sampling programs, are returned to a state that is compatible with the original undisturbed areas upon completion of mining activities. The progressive rehabilitation measures proposed as part of the Preliminary Closure Plan are technically and economically feasible and reflect the objectives of the Preliminary Closure Plan.

Most of the Project areas will be actively used during the construction and operation phases. Where practicable, the inactive areas will be progressively reclaimed during construction and operations.

5.1.1 Progressive Reclamation of the Mine Site

Studies will be undertaken to identify best practices for promoting natural re-vegetation of disturbed areas of the Mine Site that are predisposed to the presence of terrestrial plants. It must be noted that

in much of the Project Area, vegetation is naturally sparse or nonexistent (e.g., waste rock pile footprint). Therefore, natural re-vegetation for those areas is expected to be minimal and the reclamation goal for those areas will be long term landform stability.

It should also be noted participation of local communities via QIA representatives and other applicable regulatory agencies in the consideration of alternative reclamation activities to safeguard community values is encouraged. To that end, Baffinland has committed to establish an advisory group focused on reclamation of the Project that will allow for local community input and involvement in future revisions to this document.

The following areas will be progressively reclaimed during the construction and/or operation phases at the Mine Site:

- Laydown areas - un-used areas or areas no longer needed during operations will be regarded and scarified to encourage natural re-vegetation.
- Quarries and Borrow Pits - once exhausted or no longer required, sites will be graded to maintain safe side slopes and re-establish the natural drainage of the area. Closure and reclamation of these sites will be carried out in accordance the site specific permits as outlined in the individual Borrow Pit or Quarry Operating Plan.
- Landfill - the landfill will be progressively covered with cover consisting of overburden to allow the contents of the landfill to remain permanently frozen.
- Camps - following the construction phase, construction camps will be removed and/or downsized to accommodate the reduced personnel onsite during operations. Associated structures and infrastructure not required for on-going operation will be removed from the site. The affected area will be re-graded, and selectively scarified and contoured to facilitate natural drainage.
- Waste rock stockpile - will be monitored during operations. Based on current investigations it is anticipated that most of the waste rock will not be prone to metal leaching or acid drainage. However, if ongoing work characterization studies show that the minor portion waste rock that is potentially acid generating (PAG) could cause unacceptable impact to runoff and seepage, the waste rock dump construction strategy will be modified accordingly.
- Landfarms – hydrocarbon-contaminated soils will be excavated and treated in the landfarms throughout the life of the Project.
- Facilities not in use during the operations phase will be demolished, removed, and disposed of in approved site landfills, the Mine pit, quarries or off-site disposal facilities.

- Roads – roads no longer required during operations, such as the railway construction access road, will be decommissioned. Stream crossings will be removed, and drainage channels that are stable in the long-term will be re-established.

5.1.2 Progressive Reclamation of Milne Port

Following the construction phase the camp facilities will be downsized and temporary decommissioned. Milne Port will not be permanently decommissioned and reclaimed due to occasional use to receive large loads in open water periods.

5.1.3 Progressive Reclamation of Steensby Port

Following the construction phase, the construction docks will be decommissioned. The ballast and caissons will be removed and either reused at either the Mine Site or Milne Port or disposed of at an approved facility. The following additional activities will be undertaken to progressively reclaim Steensby Port:

- The Steensby Port landfill will be progressively reclaimed using a cover to allow the waste materials to remain permanently frozen and isolated;
- Quarries and borrow areas not used for disposal during final reclamation, will be re-contoured to maintain safe side slopes and re-establish natural drainage; and
- The construction camp will be downsized to accommodate the reduced personnel remaining onsite during operations.

5.1.4 Progressive Reclamation Associated with the Railway

Following completion of the railway, the following progressive reclamation activities will be undertaken:

- The railway construction camps will be decommissioned and include the following reclamation activities:
 - ♦ Dismantling of the water treatment and sewage treatment systems as per the manufacturer's specifications. All remaining infrastructure will either be sea lifted to an approved facility for disposal or disposed of at the Mine Site landfill, Steensby Port landfill, or other approved repositories;
 - ♦ Where practical, buildings, equipment and machinery will be reused. Alternatively, buildings, equipment and machinery will be demolished and sent for searift to an approved facility for salvage/disposal or disposed of at the Mine Site landfill, Steensby Port landfill, or other approved repositories;

- ♦ All fuel storage containers will be drained and removed from the camp sites for disposal at an approved facility. Secondary containment structures such as liners, will also be removed, tested for hydrocarbon content and sent to an approved facility at the Mine Site or Steensby Port for disposal;
 - ♦ Soils suspected of hydrocarbon contamination will be tested. It is expected contaminated soils will be bioremediated within landfarms located at either the Mine Site or Steensby Port or alternatively, sent via searift to an approved facility for disposal;
 - ♦ All non recyclable, inert materials (i.e. material having insignificant leachability and pollution content) will be disposed of at the Mine Site landfill, Steensby Port landfill, or other approved repositories. At closure, the onsite landfills located at the Mine Site and Steensby Port will be reclaimed by capping the landfill with overburden or equivalent material. The landfill sites will be allowed to naturally revegetate; and
 - ♦ All disturbed areas will be regarded to restore the natural drainage of the area and will be scarified to encourage natural re-vegetation.
- The construction access road along the rail alignment with arteries to the camps and quarries will be decommissioned. All water crossings will be removed and the natural drainage of the area will be restored;
 - All quarries and borrow areas will be graded to maintain safe side slopes and natural drainage will be restored unless they are an approved disposal location to be used during reclamation;
 - All disturbed areas will be will be scarified to encourage natural re-vegetation;
 - Areas experiencing thermal disruptions (ponding, settlement and/or subsidence) will be drained of excess water, regarded and/or insulated with a layer of overburden to restore the natural drainage of the area and maintain an active layer above the permafrost of 1 to 2 m (pers. comm. Wiseman). The affected areas will be scarified to encourage natural re-vegetation;
 - Phase I Environmental Site Assessments (ESA) will be carried out on the rail embankment. Further assessment will follow the ESA protocols.
 - Progressive reclamation associated with the railroad will be revised at a later stage in the Project and include measures relative assessing and remediating, if warranted, to:
 - ♦ Railroad maintenance facilities that have generated wastes and the potential for spillage of solvents and heavy metals;
 - ♦ Railroad fuelling facilities: diesel spillage, diesel recovery, water treatment, soil remediation. Storage of gasoline at fuelling facilities;
 - ♦ Ballast geochemistry, potential ML/ARD;

- ◆ Other materials to be hauled on the line such as diesel which have the potential to contaminate ballast and soils;
- ◆ Ore dust from moving trains;
- ◆ Ore spillage into the ballast from movement of trains;
- ◆ Ballast cleaning and disposal of recovered fines; and
- ◆ Tie replacement and disposal of used ties.

6. Temporary Mine Closure Care and Maintenance

The Mine Site Reclamation Policy for Nunavut (2002) and the Mine Site Reclamation Policy for the Northwest Territories (2002) require that contingency measures be established in the Preliminary Closure Plan for Temporary Closure of a mine site. Under the Guidelines for Abandonment and Restoration Planning for Mines in the Northwest Territories (NWTWB, 1990) temporary closure is the planned shutdown of a mine site for a period of less than one year. This section of the report presents the conceptual plans for Temporary Closure of a duration less than one year. The following section of this report deals with Long-Term Temporary Closure beyond one year.

In the event of temporary closure, the Project sites will be maintained through the implementation of a “care and maintenance plan” executed by operational maintenance staff and other support personnel on site. Access to the Project sites, buildings and structures will be restricted to authorized persons only, as during operations. Buildings where potential hazards exist will be locked or otherwise secured.

Specific end goals and major targets for reclamation and closure will be developed for each Project component as the Project progresses and within specific regulatory time frames. They include:

- Habitat protection and restoration;
- Reclamation of disturbed areas and natural re-vegetation, where appropriate;
- Erosion control;
- Management and control of slope stability;
- Land use restoration;
- Demolition and removal of all structures not part of a long term plan;
- Control of all discharges and effluents to acceptable regulatory limits;
- Control of solid and hazardous waste and their impacts on the environment;

- Management of the site on the long term during the closure and post closure period; and
- Adequate incident response and emergency response commitments.

6.1 Health and Safety of Workers and the Public during Temporary Closure

Health and Safety of Workers and the Public will be ensured during Temporary Closure. Infrastructures will be kept secure by routine maintenance and inspections (see Sections 5.3, 5.4 and 5.6) to eliminate any hazard to the public health and safety or material erosion to the terrestrial or aquatic receiving environment at concentrations that are harmful. Access to buildings and infrastructures will be restricted to authorized personnel only (see Section 5.2).

Employees on site will have been trained for site-specific health and safety. Baffinland commits to abide by all applicable Northwest Territories & Nunavut Health and Safety Regulations, including the Mine Health and Safety Act and the Explosives Use Act.

It will be ensured that emergency procedures will be applicable and that all equipment necessary for these procedures will be accessible and kept in good working condition.

6.2 Restriction of Access and Site Security

During Temporary Closure the Mine Site, Milne Port and Steensby Port will be maintained in a secure condition through the provision of continuous site security. Mine dewatering and water treatment where required will be on-going. As a result a number of operational maintenance staff, environmental personnel and other support personnel will be onsite at the Mine Site, Milne Port and Steensby Port. Access to buildings and structures will be restricted to authorized persons, as during operations. Buildings where potential hazards exist will be locked or otherwise secured.

Security personnel will carry out routine inspections of security, safety and environmental measures and maintain a record of these inspections. Contact information will be provided to pertinent government and Inuit agencies to facilitate their communication and potential access to the Mine Site, Milne Port and/or Steensby Port, if and when necessary.

The explosives contractor will manage explosives in accordance with applicable regulatory requirements. On commencement of Temporary Closure, explosives will be either removed from the Project or/and detonated in a controlled and safe fashion by experienced and licensed personnel at appropriate locations away from sensitive receptors.

During or prior to the Temporary Closure an inventory of all hydrocarbon products, chemicals, explosives and hazardous wastes (e.g. used oils, ammonium nitrate and greases) will be updated and all hazardous materials and wastes will be shipped south to the appropriate hazardous waste disposal facility via sealift. All storage facilities that contained any such materials will be secured and

monitored. Inert waste will be disposed of in the landfill sites or other approved repositories at the Mine Site or Steensby Port.

During Temporary Closure the non-hazardous waste management facilities at the Project will continue as in normal operations on an as required basis. If waste management facilities are no longer required, landfills will be covered with 1.5 m of over burden.

During Temporary Closure, reclamation activities such as re-grading and re-vegetation will continue as per the progressive reclamation plan (see Section 4). Erosion and discharge streams will be controlled as part of regular maintenance activities. Additionally, care will be taken that lines and pipes do not freeze and break.

6.3 Security of Mine Openings

The entrance ramp to the open pit will be fenced using boulders or other means to prevent inadvertent access. Signage indicating an "Open Hole" will already be in place around the open pit perimeter during operations as per Northwest Territories & Nunavut Mine Health and Safety Act Regulations.

6.4 Security of Mechanical, Hydraulic Systems and Electrical Systems

During Temporary Closure, equipment required for the security and safety, including environmental aspects and safety will be maintained in working condition.

Buildings will be locked or otherwise secured to prevent inadvertent access once the Mine Site, Milne Port and Steensby Port are evacuated by the majority of the personnel, except as required by the onsite staff for site maintenance and security. Non-essential mechanical and hydraulic systems will be left in a no-load condition. Live electrical systems will be fenced, locked, or otherwise secured against inadvertent entry or contact, and appropriate signs will be placed to warn of potential hazards.

6.5 Control of Effluents

Mine Site, Milne Port and Steensby Port water management will be required during Temporary Closure, including:

- Domestic sewage treatment; and
- Surface/discharge waters, as per applicable regulatory requirements.

Surface water will be collected in settlement ponds and tested for Mining Metal Effluent Requirements (MMER) as presented in Table 6-1. Waste rock stockpile will be monitored during

operations. Based on current investigations it is anticipated that most of the waste rock will not be prone to metal leaching or acid drainage. However, if ongoing work characterization studies show that the minor portion waste rock that is potentially acid generating (PAG) could cause unacceptable impact to runoff and seepage, the waste rock dump construction strategy will be modified accordingly. If treatment is required, water will be batch treated with lime dosing for Acid Rock Drainage (ARD) affected water or a treatment plant such as a High Density Sludge (HDS) treatment plant may be required.

The Waste Rock Management Plan provides treatment options in the event that waste rock run-off requires treatment. The Wastewater Management Plan provides the design criteria and operations and maintenance requirements for the collection and treatment of the site's wastewater.

6.6 Stabilization of Stockpiles

Ore and waste rock stockpiles located will be visually assessed for stability at the start of Temporary Closure and stabilized if required. The stockpiles will be periodically inspected during the Temporary Closure.

6.7 Schedule of Rehabilitation Measures - Short Term Temporary Closure

Reclamation work will be completed within approximately two months following the initiation of Temporary Closure status.

Employees, local communities, and the public will be notified in advance of any scheduled short term temporary closure activities.

7. Long-Term Temporary Mine Closure Care and Maintenance

The Guidelines for Abandonment and Restoration Planning for Mines in the Northwest Territories (NWTWB, 1990) define Long-Term Closure as the state of inactivity resulting from economic considerations or a reduction in ore reserves for a period greater than one year. During Long-Term Closure the Project sites will be maintained in a secure condition. Site personnel will conduct general inspections periodically and may decrease that frequency if the site inspections indicate that the site infrastructure is stable. A record of these inspections will be maintained. The names of contact persons will be provided to the pertinent regulators and government agencies such as Indian Northern Affairs Canada (INAC) and QIA for their information and to facilitate their access to the site if and when necessary. The Project could reopen when the circumstances requiring the closure change (e.g., when economic or other conditions that caused the temporary cessation of operations is no longer of concern).

Baffinland commits to mobilizing qualified environmental support personnel to complete tasks related to environmental management and monitoring.

7.1 Health and Safety of Workers and the Public during Long-Term Temporary Closure

Health and Safety of Workers and the Public will be ensured during Long-Term Temporary Closure. Infrastructures will be kept secure by routine maintenance and inspections (see Sections 5.3, 5.4, and 5.6) to eliminate any hazard to the public health and safety or material erosion to the terrestrial or aquatic receiving environment at concentrations that are harmful. Access to buildings and infrastructures will be restricted to authorized personnel only (see Section 6.2). Safety will be reinforced by an inspection program (see Section 6.8).

Employees on site will have been trained for site-specific health and safety. Baffinland commits to abide by the Northwest and Northwest Territories & Nunavut Health and Safety Regulations, including the Mine Health and Safety Act and the Explosives Use Act.

It will be ensured that emergency procedures will be applicable and that all equipment necessary for these procedures will be accessible and kept in good working condition.

7.2 Restriction of Access and Site Security

During Long-Term Closure the Mine Site, Milne Port and Steensby Port will be maintained in a secure condition. Access to the buildings and structures will be locked and/or fenced/gated. Potentially unsafe areas will be posted with appropriate signage. Unused machinery and equipment will be removed, where practical.

Site personnel will conduct general site inspections on a periodic basis. Initial site inspections are proposed to be conducted periodically and may decrease in frequency if the site inspections indicate that the site infrastructure is stable. The site personnel will maintain a record of these inspections. The names of contact persons will be provided to the pertinent associations such as INAC and QIA for their information and to facilitate their access to the site if and when necessary.

7.3 Security of Open Pit

Following notice of Long-Term Closure the pit walls of the open pit will be inspected by a qualified professional to assess the physical stability. Pit water will be monitored during the course of the operation for any indication of contamination at levels that exceed MMER or may adversely affect the receiving environment. During Long-Term Closure dewatering of the open pit will cease and the open pit be allowed to naturally flood. It is anticipated that the final configuration of the open pit will take an estimated 85 to 150 years to passively fill with water from natural sources such as direct

precipitation and surface runoff (KP 2008). Therefore, it is anticipated that the open pit will not completely flood during Long-Term Closure and drainage from the open pit is not considered to be an issue.

Other Long-Term Closure activities to close out the open pit include:

- Barricading access ramps into the open pit; and
- Placing of fencing and "Danger"/"Open Hole" signage as necessary.

7.4 Security of Mechanical, Hydraulic, and Electrical Systems

All buildings will be locked and/or otherwise secured to prevent inadvertent access once the Project is evacuated by the majority of the personnel, except as required by the onsite staff for site maintenance and security. All non-essential mechanical and hydraulic systems will be left in a no-load condition. Live electrical systems will be fenced, locked, or otherwise secured against inadvertent entry or contact, and appropriate signs will be placed to warn of potential hazards.

7.5 Waste Management Sites

Inert waste will first be disposed of in the landfill sites or other approved repositories at the Mine Site or Steensby Port. During operations the landfills will be covered with an interim soil cover layer to ensure wastes are encapsulated within permafrost. As such, contaminated runoff or seepage from the landfill sites are not anticipated during Long-Term Temporary Closure.

7.6 Security of Chemicals

All hazardous materials and wastes will be removed from Project sites via sealift and disposed of at an licensed hazardous waste disposal facility in Southern Canada via sealift. Any remaining explosives (e.g. ammonium nitrate) will be removed from the site or detonated in a controlled and safe fashion by qualified and licensed personnel.

During Long-Term Closure activities, remaining chemicals and petroleum products will be identified and their quantities will be recorded. Offsite disposal locations will be identified for the products remaining onsite and they will be disposed at approved facilities once no longer required.

7.7 Stabilization of Stockpiles

At the onset of Long-Term Closure the waste rock stockpile may undergo minor re-contouring and the physical and chemical stability of the waste rock stockpile will be assessed. Following this investigation and accordingly to the stockpile geometry at the time of long-term closure, aspects related to erosion, runoff control, slopes, benches, and discharges will be addressed.

All ore stockpiles will be depleted and removed prior to Long-Term Closure. In the event the ore stockpiles remain during Long-Term Closure, they will be monitored.

7.8 Site Inspection Program

The general site areas at the Mine Site, Milne Port and Steensby Port will be periodically inspected by onsite security personnel. Visual inspections of the Mine Site, Milne Port and Steensby Port will be carried out to verify physical stability of waste rock stockpiles and pit walls. Chemical analyses of surface water will be conducted monthly by site security personnel at the Mine Site, Milne Port and Steensby Port. If seepage or drainage locations are identified during the visual site inspections of the open pit, waste rock stockpile and ore stockpiles sampling will be conducted, by site security personnel.

7.9 Schedule of Rehabilitation Measures – Long-Term Temporary Closure

The following activities will be carried out within approximately six months of the initiation of Long-Term Closure:

- All buildings and storage compounds will be fenced and gated, to prevent inadvertent access;
- All unnecessary machinery and equipment will be removed or placed in a no load condition;
- All unused pipelines will be drained;
- All unnecessary equipment will be removed from the Mine Site, Milne Port and Steensby Port or secured in a no load condition onsite;
- A contact person will be designated for authorized site access;
- A schedule will be established for monitoring purposes;
- Fences and/or barriers with signs will be constructed to restrict access as required;
- All explosives, fuel tanks, chemicals and hazardous wastes will be inventoried and secured in a protective environment and/or removed from the site to an approved facility; and
- Within one year of the decision to place the Project in Long-Term Closure the following additional activities will be completed, if not already done:
 - ♦ All remaining fuels, chemicals, oil, grease and any used oil will be removed for reuse or disposal at an approved facility; and
 - ♦ All employees, local communities, and the public will be notified in advance of any scheduled long-term closure activities.

8. Final Mine Closure and Reclamation Measures

Mining activities are anticipated to be completed when the ore deposit is exhausted and the mine ceases operations without the intent to resume mining activities in the future. Prior to this date the Interim Mine Closure and Reclamation Plan will be updated in detail so that the Final Plan may be submitted. Within 60 days of completion of closing out the site a Final Mine Closure and Reclamation Plan will be issued to the Land Use Engineer of INAC (Territorial Land Use Regulations; Sections 33 and 35), to the Lands Director at QIA and to the Nunavut Water Board.

This section describes the measures that will be undertaken for final closure of the Project, based on the current design. As the Project advances through the detailed design phase, changes to the Project may occur that will alter the Preliminary Closure Plan. Though changes may occur, at this time, it is anticipated that the major components of the Project will remain the same.

Prior to closing out the Mary River Project Baffinland will consult with the QIA and surrounding communities regarding transfer of ownership of structures that may be utilized by the surrounding communities during harvests, camping and other recreational uses or relocated to local hamlets.

8.1 Health and Safety of Workers and the Public

Health and Safety of Workers and the Public will be ensured during Final Mine Closure. Until final reclamation of infrastructure, all infrastructures will be kept secure by routine maintenance and inspections (see Sections 5.3, 5.4 and 5.6) to eliminate any hazard to the public health and safety or material erosion to the terrestrial or aquatic receiving environment at concentrations that are harmful. Access to buildings and infrastructures will be restricted to authorized personnel only (see Section 6.2). Safety will be reinforced by an inspection program (see Section 6.8).

Employees on site will have been trained for site-specific health and safety. Baffinland commits to abide by all applicable Northwest Territories & Nunavut Health and Safety Regulations, including the Mine Health and Safety Act and the Explosives Use Act.

Emergency procedures will be revised to ensure they will be applicable during final closure.

8.2 Open Pit

Conceptual modelling of the pit water quality will be presented in the FEIS. Predictions of pit water quality will be updated throughout the life of the Project as more information comes available on the geochemistry of the waste rock and the pit wall.

The Final Mine Closure and Reclamation Plan will present a time frame for the potential development of ARD conditions and discuss the impact of ARD release on final closure identifying the need for ongoing monitoring, treatment, and, potential mitigations.

Following completion of operations the pit walls of the open pit will be inspected by a qualified engineering professional to assess the physical stability and for any indicators of Acid Rock Drainage and/or Metal Leaching (ARD/ML). If ARD and/or ML are identified during the inspection, the impacts ARD would have on closure plan, monitoring, long-term maintenance and bonding will be addressed. ARD and ML will be periodically reassessed as a potential issue in the in the Interim and Final Closure Plans as exploration and development continues. Inspections will also address the stability of the pit walls and pit lake.

Backfilling of open pits at closure is rarely conducted due to the high cost even when sufficient materials are present on the property. At some Projects where multiple pits are present, backfilling may occur sequentially during operation, such that mineral waste can be deposited directly into another pit without double handling of material. For these reasons, it is proposed that the open pit be allowed to naturally flood to create a pit lake. At closure inert wastes (i.e. material having insignificant leachability and pollution content) may be disposed of in the open pit. All wastes in the open pit will be covered with a minimum of 3 m of overburden or equivalent. It is anticipated that the open pit will take an estimated 85 to 150 years to passively fill with water from natural sources such as seepage into the pit, direct precipitation and surface runoff (KP 2008).

Once the open pit fills to the point of overflow, pit drainage will enter the natural environment through the spillway and natural drainage from the southeast corner of the open pit (KP 2008). It is currently anticipated that the discharge from the open pit will not require treatment (AMEC 2010). However, if treatment is required several effective technologies are currently available to manage ARD. If ARD/ML drainage were to develop, batch treatments will be carried out over several decades to adjust the pH and/or metal concentrations of the water in the pit so that it meets discharge requirements before overflow to the environment. The overflow location at the southeast area of the pit will provide emergency access to and from the open pit/pit lake.

Other activities to close out the open pit will include:

- Barricading access ramps into the open pit;
- Removal of any dewatering infrastructure (i.e., pumps, surge box and pipelines);
- Clean up of any soil contamination (i.e., hydrocarbon); and
- Placing of boulder fencing or equivalent and hazard signage as necessary.

8.3 Removal of Buildings and Infrastructure

Specific criteria for the buildings and infrastructure include:

- Ensure buildings do not become a source of contamination or a safety hazard to wildlife and humans;
- Ensure infrastructure does not become a source of contamination;
- Return area to its natural state or to a state compatible with the desired end use;
- Restore natural drainage patterns where surface infrastructure has been removed;
- Restore the natural use by wildlife; and
- Buildings and infrastructure located at the Mine Site, Milne Port and Steensby Port will be removed and either:
 - ♦ Transported to Milne Port or Steensby Port for shipment to the mainland for either disposal or salvage; or
 - ♦ Disposed of in the onsite landfills or other approved repository; or
 - ♦ Donated to local communities.

The water supply system at both the Mine Site, Milne Port and Steensby Port will be demolished, removed and either:

- Sealift to the mainland for disposal or salvage; or
- Disposed of in the onsite landfills or other approved repository.

The sewage treatment plants located at the Mine Site, Milne Port and Steensby Port will be decommissioned as per the manufacturer's specifications. The remaining sewage treatment plant components will be either transported for sealift to the mainland for disposal or salvage or disposed of in the onsite landfill.

The Mine Site utilidor/corridor will be dismantled and disposed of in either the Mine Site landfill or transported offsite to the mainland via sealift for disposal at an approved facility.

8.4 Removal of Machinery, Equipment, and Storage Tanks

Salvageable machinery, equipment and other materials will be dismantled and taken offsite for sale or reuse if economically feasible; if not, they will be cleaned of oil and grease, where appropriate, and deposited within onsite landfills or the open pit. Gearboxes or other equipment containing

hydrocarbons that cannot readily be cleaned will be removed and sent to either Milne Port or Steensby Port for sea-lift to an approved disposal facility.

Empty fuel storage tanks, drums and other fuel storage containers will be drained and removed from the Mine Site, Milne Port and Steensby Port for disposal at an approved facility. Secondary containment structures such as liners will also be removed, tested for hydrocarbon content and sent to an approved offsite facility for disposal, as required.

8.5 Transportation Corridors

Water crossings along the Milne Inlet Tote Road will be removed but the road will remain in place. This road is part of the Inuit-Owned Lands referenced in the Nunavut Land Claims Agreement; it is designated for public use and will be left intact.

The bridges, culverts and other water crossings associated with the Steensby Port rail alignment will be decommissioned and the natural drainage and water flows will be restored. Tunnel portals will be backfilled and plugged with rock or equivalent material as available and the openings at each end sealed with concrete. The steel rails and rail ties will be removed from the railway and transported to Steensby Port for sealift and offsite salvage. The embankment will remain.

The reclamation measures for the rail alignment will be carried out on the entire length of the rail and on a width of 10 m. Reclamation for these transportation corridors will take place on both Inuit Owned Land and Crown Land.

The railroad embankment is to be left in place upon closure. However, the rail ballast will be tested to determine if it can be left in place at closure. If found unacceptable (from an environmental point of view), the ballast will be cleaned. The resultant fines will be hauled away for more controlled disposal.

Locomotives and cars will be sealifted offsite for resale, salvage or disposal at an approved facility.

As more information becomes available, the discussion of railroad closure will be expanded to include the following:

- Railroad maintenance facilities – wastes and releases. Solvents are often an issue at maintenance facilities, as are heavy metals;
- Railroad fuelling facilities- diesel spillage, diesel recovery, water treatment, soil remediation. Storage of gasoline at fuelling facilities;
- Bioremediation of diesel contaminated soils in the Arctic;

- Quarries and their reclamation: 27,000,000 tonnes of rock will be quarried for the railroad use from 63 quarries;
- Phase I Environmental Site Assessment (ESA) will be carried out on the rail embankment. Further assessment will follow the ESA protocols; and
- Other materials to be hauled on the line such as diesel which may ultimately contaminate ballast and soils.

The shelters and communication towers along the rail alignment will be dismantled and disposed of in either the Mine Site or Steensby Port landfills or transported offsite via sealift for disposal at an approved facility.

8.6 Docks and Airstrip

The docks at Steensby Port will be left in place. The rock causeway connecting Steensby Port and Steensby Island will be left in place.

The docks and infrastructure and Milne Port will be removed and either recycled or shipped offsite to an appropriate facility for disposal.

The lighting at the airstrips located at the Mine Site, Milne Port and Steensby Port will be removed. The airstrips will be abandoned, but left in good working order unless otherwise directed by regulatory agencies, to provide emergency/rescue landing spots for regional aircraft.

8.7 Concrete Structures

Concrete foundations will be demolished and exposed rebar will be cut to ground level to prevent safety hazards. Concrete and rebar will be disposed of in the open pit, waste rock stockpile or landfill, and the concrete foundation areas cover with non acid-generating mine rock or overburden. The area will be regarded to restore the natural drainage. Any remaining concrete piles will be cut to grade and covered with overburden.

8.8 Removal of Chemicals

At final closure, Baffinland will undertake a comprehensive site Phase 1 Environmental Site Assessment (ESA) to determine extent of contaminated areas and appropriate techniques and methods to deal with such sites.

The stock of explosives will be depleted towards the end of the operations phase and any remaining explosives will be securely contained and shipped from the site by a licensed contractor to an approved facility for disposal or reuse or detonated in a controlled and safe fashion by experienced and licensed personnel at appropriate locations away from sensitive receptors.

Oil, grease, ammonium nitrate and chemicals will be transported offsite for disposal at an approved facility or where applicable for reuse. All batteries and hazardous waste will be removed and disposed of or recycled at an approved facility.

8.9 Waste Management Sites

Combustible non-hazardous wastes will be incinerated at the Project incinerators. Once the incinerators are no longer required, they will be managed as described in Section 7.3. Sewage treatment facilities disposal is also addressed in Section 7.3.

Liners will be removed from polishing ponds and Sewage Water Management (SWM) ponds, and berms will be re-graded and levelled.

The onsite landfills located at the Mine Site and Steensby Port will be reclaimed by capping the landfill with 1.5 m of overburden or equivalent material. The landfill sites will be scarified to encourage natural re-vegetation.

8.10 Soils Testing

A site investigation will be conducted at the onset of closure to identify soils that may be contaminated with hydrocarbons or chemicals. Soil materials found to exceed the appropriate cleanup criteria for hydrocarbons will be remediated onsite in the landfarm units or removed offsite to a licensed waste management facility.

If there is reason to suspect an area of soil has been contaminated by chemicals other than hydrocarbons (such as explosives), samples will be collected and the soil will be tested. If the applicable regulatory requirements are exceeded, an appropriate method of disposal will be sought in consultation with the appropriate authorities.

8.11 Stabilization of Stockpiles

At the onset, the waste rock pile design will consider final closure considerations. A detailed sampling and testing program for the characterization of the waste rock for the period of 2012-2014 will be developed and will involve devising a representative sampling program for the waste rock based on the configuration of the ore body and the mining plan; analysis of the lithology, morphology and mineralogy of the waste rock; additional testing (both static and humidity cell). This program will be reviewed and guidance by independent experts. Contingencies will be put into place if there are acid rock drainage issues and treatment if necessary. The characterisation program will be ongoing for the Life of the Project and will guide the development of adaptive management strategies for waste rock management (should this be required over the life of the Project).

The waste rock stockpile at final closure is expected to have a total volume of about 640 Mt with average side slopes of 2H:1V. At closure the waste rock stockpile may undergo minor re-contouring. The physical and chemical stability of the waste rock stockpile will be investigated at the onset of closure. This investigation will take into account the final geometry of the stockpile, including the aerial extent, height, cross-sections and the volume in place. A preliminary assessment of this geometry and its impact on erosion, runoff control, slopes, benches, discharges, and will also be included in the Interim and Final Closure plans. Following re-contouring and stabilization investigations, the waste rock stockpiles will be considered closed. Runoff will be discharged from 2 runoff ponds that will be left in place and monitored. Based on the current state of the Mine Site prior to mining activities, the Mine Site is characterized by a rugged rocky terrain with minimal vegetation. Therefore, an uncovered waste rock stockpile is considered environmentally compatible with the undisturbed surrounding areas.

Following closure generation of ARD/ML is not anticipated. During operations drainage from the waste rock stockpile will be monitored and should ARD/ML be identified the waste rock will be segregated based on acid generating potential as discussed in Section 4.1.1. If treatment is required following closure a variety of ARD/ML treatment technologies are available. If treatment is required the waste rock stockpile drainage will be treated with batch lime doses. During operations total suspended solids (TSS) has been identified as a being a potential problem. If TSS is identified as a concern following operations the surface water from the waste rock stockpiles will be directed to additional settlement ponds for treatment prior to discharge to the surrounding environment. Please refer to the Mary River Waste Rock Management for further discussion on potential treatment methods.

Each quarry permit application presents a quarry development plan, drainage information as well as a closure plan. All borrow areas and quarries will be progressively reclaimed maintaining stable side slopes in accordance with the individual site permit. At the onset of closure the borrow areas will be investigated to assess for potential thermal damage and instability due to thaw impacts. At closure re-contouring and filling with overburden may be required to ensure slope stability and restore the natural drainage due to thermal disruptions.

The ore stockpiles will be depleted upon closure. Soils below the ore stockpiles will be sent for testing and treatment, if required, as discussed in Section 8.8. The ore stockpile bases will be recontoured as necessary scarified and allowed to naturally re-vegetate.

8.12 Watercourses and Drainage Ways

Disturbances to the surrounding areas of the Project may cause thermal disruptions to the permafrost zone resulting in ponding, settlement and/or subsidence due to changes in the active zone (the upper 1 to 2 m of soil). During closure these areas will be drained of excess water, filled with clean

material to re-establish the active layer and graded, restoring the natural drainage of the area as necessary.

Water crossings (bridges and culverts) will be removed from all transportation corridors to allow creeks and rivers to return to natural drainage conditions.

8.13 Re-vegetation

The primary goal of any re-vegetation undertaken to improve the aesthetics of the area, control potential erosion, enhance any natural re-vegetation and where practical to return the Project area to its original land uses (see Section 3.1). Due to the similarity of vegetation types this strategy will be similar to those adopted by Nanisivik Mine and Polaris Mines. It is anticipated that re-vegetation will be difficult to re-establish due to the arctic environment. The present re-vegetation strategy is to encourage disturbed areas to naturally re-vegetate. Natural re-vegetation for the Project will include:

- Re-grading and scarifying disturbed and compacted areas; and
- Allowing the established surrounding vegetation to encroach and ultimately take over the area.

8.14 Schedule of Rehabilitation Measures – Final Closure

Once the decision has been made to permanently close the mine, it is anticipated that the major closure activities, as described in the above sections, will be completed within a period of three (3) years. Closure works will be carried out between March and October every year for three (3) years, if not already completed progressively.

The ongoing monitoring and management of ARD/ML (if any) is expected to be required until such time as it can be demonstrated that site drainage no longer poses a negative impact to downstream receiving waters.

Monitoring of various site aspects such as water quality, natural re-vegetation and landform stability are expected to continue over an extended period of time until such time that monitoring is no longer required. It is estimated that this period will last 5 years.

All employees, local communities, and the public will be notified in advance of any scheduled final closure activities.

9. Post Mine Closure Monitoring

The Post Mine Closure Monitoring Plan will be developed and submitted as part of the Final Mine Closure and Reclamation Plan six months prior to final closure. The monitoring section of the Final Mine Closure and Reclamation Plan will be based upon the knowledge gained through studies

during the design, construction and operational phases of the Project. Achieved performance will be assessed against the detailed specific objectives and criteria for major Project components will be established.

A post-closure monitoring program compliant with the applicable guidelines and regulations will be implemented to ensure the reclamation measures remain effective and continue to provide a high level of protection for the public and the environment. This monitoring program will assess the effectiveness of the restoration and will be undertaken between Baffinland, AANDC, QIA and any applicable regulators or government agencies.

The monitoring presented in the subsequent sections is conceptual and focuses on the post-closure monitoring objectives. The program will be revisited following the completion of the feasibility and detailed design phases of the Project at which time a more specific monitoring program will be developed.

Monitoring and follow-up inspections will be conducted to assess the physical and chemical stability of various components after closure and reclamation of the facilities.

Biological monitoring and follow-up inspections will assess the effectiveness of the reclamation.

Ongoing monitoring and management of ARD and ML (if necessary) is required until such time as it can be demonstrated that site drainage does not pose a threat to downstream receiving waters. This includes an assessment of long-term water quality of the pit lake.

Monitoring of site aspects such as water quality is expected to continue until such time that the monitoring is no longer required.

Further updates will redefine what mitigation measures will be implemented, how these measures will be monitored to confirm their performance, the data gaps and uncertainties identified in the DEIS and how these will be addressed through monitoring or mitigation.

Post closure monitoring is expected to last three years, which will be revised if necessary as the Project progresses.

9.1 Physical Stability

The post-closure physical stability monitoring objective will be to demonstrate the physical safety of the Mine Site, Milne Port and Steensby Port and to ensure that all lands and structures remaining on the Mine Site, Milne Port and Steensby Port are left in a long term stable condition. The physical stability monitoring will also be utilized to identify any physical instability issues and to take

appropriate corrective measures. The physical stability of the following items will be monitored on annual bases for the first five years following final closure:

- Exposed pit slopes;
- Any remaining stockpiles;
- Remaining road easements; and
- Remaining rail alignment.

The stability of the pit walls with regard to the presence of the pit lake and its impact on stability will also be investigated during post-closure.

9.2 Chemical Stability

Once mining operations have been completed chemical monitoring programs will be initiated to monitor the surface and groundwater quality (in the active layer). Groundwater in the Project area is shallow seepage through the active layer and maybe monitored as surface water. The chemical stability programs will be utilized to monitor the effectiveness of the reclamation undertaken at the Mine Site, Milne Port and Steensby Port. Sample stations recommended at this time will be re-evaluated as the Project continues to develop and are therefore, subject to change in location, quantity and/or frequency of monitoring. In addition, any seeps which develop downstream of the open pit or waste rock dump will be monitored.

Monitoring programs will continue until it has been shown that the objectives of the Final Closure Plan have been achieved and a monitoring program is no longer required. The proposed parameters to be monitored are summarized in Table 9-1. The parameters represented in Table 8-1 may change as the Project develops through detailed design, construction and operations. Discharges from the Mine Site, Milne Port and Steensby Port are expected to be consistent with the Mining Metal Effluent Regulations (MMER).

9.2.1 Mine Site

Surface water monitoring at the Mine Site will include a minimum of the following samples:

- One surface water background sample location;
- One to two surface water samples located in the upstream of Sheardown Lake, the primary receiver for the Mine Site;
- One to two surface water samples located in the secondary receiver (Camp Lake tributaries) for the Mine Site;

- One surface water location to monitor the waste rock stockpile and open pit;
- One seepage location from the toe of the waste rock stockpile to monitor; and
- One to two samples to monitor seepage in the active layer downgradient from the waste rock stockpile.

9.2.2 *Steensby Port*

The following sample stations present the approximate post-closure monitoring to be conducted at Steensby Port. As the Project continues to develop the post-closure sample locations will be re-evaluated and a more detailed monitoring program will be developed. The post-closure monitoring at will include the following sample stations:

- One marine sample located by the freight dock;
- One marine sample located by the ore dock;
- One background marine sample location;
- One to two surface water or seepage locations within the Steensby Port area (one monitoring location is to be located down gradient from the ore stockpiles); and one background surface water sample location.

9.3 **Biological Monitoring**

A biological monitoring program was conducted as part of environmental baseline studies. Biological monitoring will be conducted during the operation and closure phase at the Mine Site, Milne Port and Steensby Port to assess the effectiveness of the reclamation and potential impact to the biological environment, in accordance with the MMER Technical Guidance Document on Aquatic Environmental Effects Monitoring and as otherwise required.

The monitoring section of the Final Mine Closure and Reclamation Plan will be based upon the knowledge gained through studies during the design, construction and operational phases of the Project. Achieved performance will be assessed against an agreed set of specific biological objectives and criteria for areas to be returned for wildlife use.

The list of parameters to be monitored will be revisited as construction and operation activities continue, based on what is used and disposed of on site. Petroleum hydrocarbons, diesel range organics, additional metals and nitrates are examples of parameters that will be considered for future monitoring. Similarly, after investigation of the materials that have been disposed in the landfills, a list of parameters will be established and monitoring activities will be planned accordingly.

Table 9-1: Proposed Post-Closure Monitoring Parameters

General Parameters	Metals
pH	Arsenic
Total Suspended Solids	Aluminum
Total Ammonia	Cadmium
Total Dissolved Solids	Calcium
Sulphate	
Conductivity	Molybdenum
Alkalinity	Copper
Acidity	Iron
Hardness	Lead
Ammonium	Nickel
	Zinc

10. Expected Site Conditions Following Final Closure

10.1 Land Use

The overall intent of the final closure is to restore the Project to a productive land use, that is self-sustaining and to mitigate impacts from mining activities. In such a condition, the site areas will provide wildlife and aquatic habitat.

Creeks and rivers will be returned to natural drainage by removing bridges and culverts located on the railway alignment and its access roads, and by removing culverts from Tote Road. A new lake will be created from the water inflow open pit.

10.2 Site Topography

10.2.1 Mine Site

Relative to predevelopment site conditions, the principal topographic changes to the site will include the following:

- The waste rock stockpile will remain at closure with a maximum elevation of 810 masl.
- The open pit will naturally flood at closure ultimately forming a pit lake.
- Remnants of other infrastructure at the Mine Site, including the crusher and buildings will be demolished and laydown areas regarded and scarified to enhance natural re-vegetation at closure.
- The airstrip at the Mine Site will be abandoned, but not otherwise scarified or actively reclaimed unless otherwise directed by regulatory agencies, because abandoned airstrips can provide emergency landing locations for regional aircraft, when no other options are available. The airstrips will also be required to conduct ongoing Long-Term monitoring.

10.2.2 Milne Port and Milne Inlet Tote Road

Relative to predevelopment conditions at Milne Port the remnants of infrastructure including buildings will be demolished and laydown areas regarded and scarified to enhance to natural re-vegetation at closure. The airstrip at Milne Port will be abandoned but otherwise left intact to provide an emergency landing spot for aircraft. The water crossings along the Milne Inlet Tote Road will be removed. Otherwise the Milne Inlet Tote Road will remain intact.

10.2.3 Steensby Port and Rail Alignment

Relative to predevelopment conditions at Steensby Port, the remnants of infrastructure including buildings will be demolished and laydown areas regarded and scarified to enhance natural re-vegetation at closure. The airstrip at Steensby Port will be abandoned but otherwise left intact to provide an emergency landing location for aircraft. All dock structures will be left intact at Steensby Port but infrastructure will be removed.

Steel rails and ties will be removed from the railway. All water crossings will be removed. The railway embankment will remain intact.

Tunnels will be sealed. The portals will be backfilled and plugged with rock and sealed with concrete.

10.3 Local Surface Water

Disturbances to the surrounding areas of the Project may cause thermal disruptions to the permafrost zone resulting in ponding, settlement and/or subsidence due to changes in the active layer (approximately the upper 1 to 2 m of soil). During closure these areas will be drained of excess water, filled with clean material to insulate and re-establish the active layer and graded, restoring the natural drainage of the area as necessary.

The natural drainage of water courses will be re-established for long term stability.

11. Closure Criteria

Specific criteria for the Final Closure of Project components include:

Project Component	Closure Criteria
Open Pit	<ul style="list-style-type: none"> Minimize access to protect human and wildlife safety. Allow emergency access and escape routes from flooded pits. Implement water management strategies to minimize and control migration and discharge of contaminated drainage, and if required, collect and treat contaminated water. Meet water quality objectives for any discharge from pit. Stabilize slopes to minimize erosion and slumping. Meet end land use target for resulting surface expression. Establish original or desired new surface drainage patterns. Ensure physical stability of residual earth structures for environmental, human, and wildlife safety. Physical stability of remaining earth structures is compatible with, and will not be compromised by, the post-closure land use.
Removal of Buildings and Infrastructure	<ul style="list-style-type: none"> Ensure buildings do not become a source of contamination or a safety hazard to wildlife and humans. Ensure infrastructure does not become a source of contamination. Return area to a state compatible with the desired end use. Restore natural drainage patterns where surface infrastructure has been removed. Restore the natural use by wildlife.
Removal of Machinery, Equipment and Storage Tanks	<ul style="list-style-type: none"> Ensure equipment do not become a source of contamination or a safety hazard to wildlife and humans.
Transportation Corridors	<ul style="list-style-type: none"> Return area to a state compatible with the desired end use. Restore natural drainage patterns where surface infrastructure has been removed. Restore the natural use by wildlife. Remediate any sources of contamination that may have been created during the development and operation of the mine site in order to protect humans, wildlife, and environmental health.
Waste Management Sites	<ul style="list-style-type: none"> Dismantle and remove/dispose of as much of the system as possible Stabilize and protect from erosion and failure for the long term Achieve approved water quality limits, and in the case of existing mines, implement long term treatment
Stabilization of Stockpiles	<ul style="list-style-type: none"> Minimize erosion, thaw settlement, slope failure, collapse or the release of contaminants or sediments. Build to blend in with current topography, be compatible with wildlife use, and/or meet future land use targets. Develop and implement preventive and control strategies to effectively minimize the potential for ARD and ML to occur. Where ARD and ML are occurring as a result of mine activities, mitigate and minimize impacts to the environment. Assist with providing physical stability of mine components.

Project Component	Closure Criteria
	<ul style="list-style-type: none"> • Ensure physical stability of residual earth structures for environmental, human, and wildlife safety. • Physical stability of remaining earth structures is compatible with, and will not be compromised by, the post-closure land use.
Watercourses and Drainage Ways	<ul style="list-style-type: none"> • Dismantle and remove/dispose of as much of the system as possible and restore natural drainage patterns. • Stabilize and protect from erosion and failure for the long term. • Achieve approved water quality limits.
Re-vegetation	<ul style="list-style-type: none"> • Re-establish the pre-mining ground cover, which may involve encouraging self-sustainable indigenous vegetation growth (natural re-vegetation). • Provide wildlife habitat where appropriate and feasible. • Assist with providing physical stability of mine components.

12. Estimated Closure and Reclamation Costs

The financial cost of the Mary River Project closure and reclamation has been estimated using The Mining RECLAIM spreadsheet provided by Aboriginal Affairs and Northern Development Canada (AANDC) (formerly Department of Indian Affairs and Northern Development). This model identifies several reclamation components:

- Open pit;
- Waste Rock pile;
- Buildings and Equipments;
- Chemicals;
- Water;
- Mobilization;
- Post Closure; and
- Ongoing water monitoring.

Several reclamation strategies (“Objectives”) are listed for each component, and broken down into lists of actions that can be priced separately. A unit cost spreadsheet provides a range of prices for most actions; it has been completed where possible with the most accurate available or Project-specific costs. To best estimate the total reclamation cost, some actions were modified or adapted to the strategies defined in the Preliminary Mine Closure and reclamation Plan.

The financial cost obtained is based on the information available at the time of publishing. Several assumptions and estimations have been made and are described in Appendix B. The spreadsheet will require to be updated annually as the Project progresses. To make up for uncertainties, the highest prices of the range provided by the unit costs spreadsheet were systematically chosen.

MINING RECLAIM calculates the grand total capital costs required for the Project closure and reclamation. The cost is split into land and water liability. Additionally, the cost associated to Inuit Owned Land (IOL) and Federal Owned and (FOL) has been differentiated. From North to South, Milne Inlet, Tote Road, Mary River Mine, and the first 25km of the railway are located on Inuit land. The remaining section of the railway and Steensby Port are located in federally owned land. Costs relating to the infrastructure, equipments and remediation actions on these sites were attributed to the corresponding category. Less tangible components, such as chemicals and soil management, water management and post-closure monitoring and maintenance were attributed on a basis of two thirds (2/3) to IOL and one third (1/3) to FOL. This was based on two of the main sites (Milne Inlet, Mary River) being in IOL and one site (Steensby Port) located in FOL.

Mary River Project closure and reclamation is estimated to cost \$518,711,208. The break down between land and water liability and IOL/FOL is summed up in Table 12-1.

Table 12-1: Total Cost and Breakdown for Mary River Project Closure and Reclamation

	Total Cost	Land Liability	Water Liability
Inuit Owned Land	\$411,234,800	\$405,430,454	\$6,106,421
Federal Owned Land	\$107,476,408	\$105,391,574	\$2,160,637
Total	\$518,711,208	\$510,822,029	\$8,267,058

13. Concordance Table

The following concordance table has been prepared to characterize the content of the Preliminary Mine Closure and Reclamation Plan (Abandonment and Reclamation). The concordance table is consistent with the principles of the Qikiqtani Inuit Association (QIA) Abandonment and Reclamation Policy for Inuit Owned Lands ('the Policy') and structured in accordance with Appendix C of the QIA Security Policy (2010).

Table 13-1: QIA Abandonment and Reclamation Policy for Inuit Owned Lands Concordance Table

Item	QIA Abandonment and Reclamation Policy for Inuit Owned Lands (2010)	Baffinland Response
1	Have all reports and plans including addendums and responses been submitted?	Yes
2	Are the submitted reports and plans executable standalone documents with adequate rationale and detail?	Yes
3	Do all reports and plans contain appropriate referencing (document name, author, section, and page number) to all supporting information?	Yes
4	Do the reports and plans demonstrate a firm understanding, of QIA's <i>Guiding Principles on Reclamation</i> and provide rationale on how these principles have been satisfied?	Yes
5	Has Inuit Qaujimajatuqangit and consultation with Community Land and Resources Committee(s) been applied?	Not at this preliminary stage, commitment to do so in the future (Section 1.1.1)
6	Are all the components that are considered in the abandonment and reclamation plan listed?	Yes
7	Does each component of the Project have an abandonment and reclamation objectives and criteria?	Yes
8	Has an A&R plan been provided with a financial security estimate?	Yes
9	Have Tables 1, 2, 3 and 4 of the Security Policy (Appendix C) been used in completing the financial security estimate?	Yes
10	Has evidence been provided to support the Policy assumptions for all reports and plans?	Yes

Table 13-2 is a response to commitments made during the pre-technical hearings October, 2011 in Iqaluit, Nunavut. The table defines the agreed upon commitment made during these hearings and the location that the commitment is addressed in the Preliminary Mine Closure and Reclamation Plan.

Table 13-2: List of Commitments Identified and Location of the Corresponding Answer

Commitment Number	Key Mine Closure and Reclamation Plan Guidelines	Preliminary MC&RP Report Section
341	Abide by existing regulations, policies and guidelines as they relate to mine closure in Nunavut.	Table 1.1
342	Implement a progressive rehabilitation approach.	2.2
343	Update its Abandonment and Closure Plan on a regular basis.	2.2
344	Actively address, minimize and mitigate environmental effects as much as technically and economically feasible.	2.4
345	In terms of re-vegetation, Baffinland will describe and rationalize its strategy of encouragement and enhancement of natural re-vegetation in the FEIS .	5
346	Address comments made by QIA (F-06) and AANDC (comments #60 to 84) where appropriate regarding specific aspects of the conceptual closure plan within an updated Abandonment and Closure Plan which will be presented in the FEIS.	
	a) The closure plan will include a cross-reference table with the QIA closure guidelines and INAC 2007 closure guidelines.	Appendix C
	b) Actively address, minimize, and mitigate the adverse environmental effects as much as technically and economically feasible.	2.4
	c) Specific objectives and targets will be outlined in the closure plan.	11
	d) The closure plan will outline objectives and targets.	11
	e) The closure plan will address all Project components.	5
	f) The closure plan will provide estimates of surface areas to be rehabilitated at final closure.	Appendix A
	g) At final closure, Baffinland will undertake a comprehensive site environmental assessment to determine extent of contaminated areas and appropriate techniques and methods to deal with such sites.	8.8, 8.10
	h) The closure plan will address all facilities included in the Project. The quarry management plan and quarry permit application address closure of quarries.	3.2
	i) At final closure, Baffinland will undertake a comprehensive site environmental assessment to determine extent of contaminated areas and appropriate techniques and methods to deal with such sites.	8.8, 8.10
	j) Modeling of the pit water quality will be presented in the FEIS. Predictions of pit water quality will be updated throughout the life of the Project as more information comes available on the geochemistry of the waste rock and the pit wall.	9.2
	k) The closure plan will present a time frame for the expected release of ARD and discuss the impact of ARD release on final closure (need for ongoing monitoring, treatment, and, potential mitigations).	8.11
	l) The Closure Plan will explain what is meant by inert waste.	14.1
	m) At the onset, the waste rock pile is designed for closure	8.11 and FEIS

Commitment Number	Key Mine Closure and Reclamation Plan Guidelines	Preliminary MC&RP Report Section
	considerations. The FEIS will provide design criteria for the waste rock dump, a waste rock management plan (deposition strategy), stability analysis of the waste rock dump as well as discussion on thermal profile within the waste rock.	Volume 3, Appendix 3B, Attachment 5: Waste Rock Management Plan
	n) The Closure Plan will address all the management of all wastes generated at temporary or final closure.	6.2, 7.5, 7.6, 7.7, 8.8, 8.9, 8.11
	o) The Management Plan is "life of Project" commitments and address VECs, VSECs or specific activities. Management Plans remain in force during "Temporary Closure". Baffinland will comply with the terms and conditions of its water license with respect to ongoing monitoring and reporting obligations.	9
	p) Provide a detailed description with clear commitments of how tunnels will be closed to protect humans in the long term.	8.5
	q) Each quarry permit application presents a quarry development plan, drainage information as well as a closure plan.	FEIS Volume 3, Appendix 3B, Attachment 6: Borrow Pit and Quarry Management Plan, Section 1.1
	r) The Closure Plan will provide justification for the proposed duration of port closure monitoring. A final closure plan will be submitted 6 month prior to final closure. Baffinland will comply with the terms and conditions of the final closure plan.	9
	s) Re-examine the list of parameters to be monitored to include any constituents that potentially could be released (based on what is used and disposed of on-site) and all potential sources of effluents.	Table 8-1
	t) Provide supporting information on how creeks and rivers will be returned to pre-development conditions.	8.12
	u) The cross-reference tables will be updated.	Section 13, Appendix C
	v) Conceptual reclamation method will be discussed in the closure plan.	5
	w) Provide more details and specifics within the Closure Plan including a description of the size of impacts and mitigation plans and provide a discussion of how permanent closure is defined.	8,11
	x) Provide a separate section of the Closure Plan that is dedicated to health and safety of workers and the public during closure and post-closure activities.	8.1

Commitment Number	Key Mine Closure and Reclamation Plan Guidelines	Preliminary MC&RP Report Section
	y) Expand the monitoring section of the Closure Plan in scope and detail including linkages to specific objectives and major targets for reclamation and closure.	9
347	Stability of the waste rock pile and pit wall will be addressed in the FEIS.	8.11
348	The discussion and requirements for “Temporary Closure” and “Long Term Closure” will be expanded in the updated Abandonment and Closure Plan submitted with the FEIS. For Closure, either temporary or long term, all hazardous waste will be shipped off site to a licensed hazardous waste treatment facility. Inert waste will be disposed of in the landfill sites at the Mine Site or Steensby Port and discussed within the FEIS	6, 7, 6.2, 7.6, 7.5
349	In the updated Closure Plan, Baffinland will discuss conceptual reclamation methods, time frames and schedules, including notice periods to employees and public. The updated Abandonment and Closure Plan presented in the FEIS will also contain a cost estimate for abandonment and reclamation.	5, 6.7, 7.9, 8.14, 12
350	QIA will provide Baffinland with board approved A&R plan by November 15th, 2011.	Table C-1
351	Baffinland will consider QIA's A&R plans before implementing within abandonment and closure plan	Table C-1

14. Glossary of Terms, Acronyms, or Abbreviations

14.1 Glossary of Terms

TERM	MEANING
Abandonment	The permanent dismantlement of a facility so it is permanently incapable of its intended use. This includes the removal of associated equipment and structures.
Acid-Base Accounting (ABA)	Acid-Base Accounting (ABA) is a screening procedure whereby the acid-neutralizing potential and acid-generating potential of rock samples are determined
Acid generating (AG)	Production of acidity irrespective of its effect on the adjacent pore water or whether the material is net acid producing or neutralizing
Acid rock drainage (ARD)	Acidic drainage stemming from open pit, underground mining operations, waste-rock or tailings facilities that contains free sulphuric acid and dissolved metals sulphate salts, resulting from the oxidation of contained sulphide minerals or additives to the process. The acid dissolves minerals in the rocks, further changing the quality of the drainage water
Acid Potential (AP)	Maximum potential acid generation from a sample. The calculation of AP (or MPA) is an integral part of acid/base accounting
Acidity	Measure of the capacity of a solution to neutralize a strong base
Active layer	The layer of ground above the permafrost which thaws and freezes annually.

TERM	MEANING
Alkalinity	Measure of the capacity of a solution to neutralize a strong acid
Backfill	Material excavated from a site and reused for filling the surface or underground void created by mining. Reinsertion of materials in extracted part(s) of the orebody. Materials used for backfilling can be waste-rock or overburden. In most cases backfill is used to refill mined-out areas in order to: <ul style="list-style-type: none"> Assure ground stability; Prevent or reduce underground and surface subsidence; Provide roof support so that further parts of the orebody can be extracted and to increase safety; Provide an alternative to surface disposal; and Improve ventilation.
Background	An area near the site under evaluation not influenced by chemicals released from the site, or other impacts created by onsite activity.
Baseline	A surveyed condition and reference used for future surveys.
Benign	Having little or no detrimental effect.
Berm	A mound or wall, usually of earth, used to retain substances or to prevent substances from entering an area.
Best Management Practices	Any program, technology, process, operating method, measure, or device that controls, prevents, removes, or reduces pollution and impact on the environment.
Biodiversity	The variety of plants and animals that live in a specific area.
Bioremediation	The use of microorganisms or vegetation to reduce contaminant levels in soil or water.
Borrow Pit	A source of fill or embanking material.
Care and Maintenance	A term to describe the status of a mine when it undergoes a temporary closure.
Closure	When a mine ceases operations without the intent to resume mining activities in the future.
Closure Criteria	Detail to set precise measures of when the objective has been satisfied.
Comminution	Size reduction of an ore by crushing and/or grinding to such a particle size that the product is a mixture of relatively clean particles of mineral and gangue. In order to produce a relatively pure concentrate, it is necessary to grind the ore fine enough to liberate the desired minerals.
Contaminant	Any physical, chemical, biological or radiological substance in the air, soil or water that has an adverse effect. Any chemical substance with a concentration that exceeds background levels or which is not naturally occurring in the environment.
Contouring	The process of shaping the land surface to fit the form of the surrounding land.
Cumulative Effects	The combined environmental impacts that accumulate over time and space as a result of a series of similar or related actions or activities.
Crushing	Comminution process that reduces the particle size of run-of-mine ore to such a level that grinding can be carried out. This is accomplished by compression of ore against rigid surfaces, or by impact against surfaces in rigidly constrained motion path.

TERM	MEANING
Cryoconcentration	Concentration of solutes due to exclusion by ice.
Decommissioning	Process by which a mining operation is shut down i.e.: permanently closing a site; removing equipment, buildings and structures. Rehabilitation and plans for future maintenance of affected land and water are also included.
Dewatering	Process of removing water from an underground mine or open pit, or from the surrounding rock or non-lithified area. The term is also commonly used for the reduction of water content in concentrates, tailings and treatment sludges.
Disposal	The relocation, containment, treatment or processing of unwanted materials or materials that are not reusable. This may involve the removal of contaminants or their conversion to less harmful forms.
Drainage	Manner in which the waters of an area exist and move, including surface streams and groundwater pathways. A collective term for all concentrated and diffuse water flow.
Drainage Chemistry	Concentrations of dissolved components in drainage, including element concentrations, chemical species and other aqueous chemical parameters.
Effluent	Treated or untreated liquid waste material that is discharged into the environment from a structure such as a settling pond or a treatment plant.
End Land Use	The allowable use of disturbed land following reclamation. Municipal zoning and/or approval may be required for specific land uses.
Environment	Interrelated physical, chemical, biological, social, spiritual and cultural components that affect the growth and development of living organisms.
Erosion	The wearing away of rock, soil or other surface material by water, rain, waves, wind or ice; the process may be accelerated by human activities.
Evaporation	Physical process by which a liquid is changed into a gas.
Existing Operation	An installation in operation or, in accordance with legislation existing before the date on which this Directive is brought into effect, an installation authorized or in the view of the competent authority the subject of a full request for authorization, provided that that installation is put into operation no later than one year after the date on which this Directive is brought into effect.
Frost Heave	Annual ground displacements and differential ground pressures due to the freezing of water within soils.
Geochemistry	Science of the chemistry of geological materials and the interaction between geological materials with the environment.
Geology	Study of the earth, its history and the changes that have occurred or are occurring, and the rocks and non-lithified materials of which it is composed and their mode of formation and transformation.
Grade	Dimensionless proportion of any constituent in an ore, expressed often as a percentage, grams per tonne (g/t) or parts per million (ppm).
Ground Thermal Regime	Temperature conditions below the ground surface. A condition of heat losses and gains from geothermal sources and the atmosphere.
Groundwater	All subsurface water that occurs beneath the water table in rocks and geologic formations that are fully saturated. Distinct from surface water.
Humidity Cell Test	Kinetic test procedure used primarily to measure rates of acid generation and neutralization in sulphide-bearing rock.

TERM	MEANING
Hydrogeology	Science of the groundwater circuit (interrelationship of geologic materials and processes with water).
Hydrology	The science that deals with water, its properties, distribution and circulation over the Earth's surface.
Inert Waste	Material having insignificant leachability and pollution content which will not require laboratory analysis.
Infiltration	Entry of water into a porous substance.
Inukshuk	A stone representation of a person, used as a milestone or directional marker by the Inuit of the Canadian Arctic.
In Situ Treatment	A method of managing or treating contaminated soils, sludges and waters “in place” in a manner that does not require the contaminated material to be physically removed or excavated from where it originated.
Landfill	An engineered waste management facility at which waste is disposed by placing it on or in land in a manner that minimizes adverse human health and environmental effects.
Leachate	Solution obtained by leaching; e.g. water that has percolated through soil containing soluble substances and that contains certain amounts of these substances in solution.
Leaching	Passage of a solvent through porous or crushed material in order to extract components from the liquid phase. For example, gold can be extracted by heap leaching of a porous ore, or pulverized tailings. Other methods are tank leaching of ore, concentrates or tailings and in-situ leaching.
Lithology	Composition of rocks, including physical and chemical characteristics such as colour, mineralogical composition, hardness and grain size.
Migration	The movement of chemicals, bacteria, and gases in flowing water or vapour.
Mineral Resource	Concentration or occurrence of natural, solid, inorganic or fossilized organic material in or on the Earth's crust in such form and quantity and of such a grade or quality that it has reasonable prospects for economic extraction. The location, quantity, grade, geological characteristics and continuity of a Mineral Resource are known, estimated or interpreted from specific geological evidence and knowledge.
Mining	Methods and techniques to extract ore from the ground, including support facilities (e.g. stockpiles, workshops, transport, ventilation) and supporting activities in the mine itself or in the vicinity.
Mining Operation	Any extraction of ore from which mineral substances are taken, where the corporate intent is to make an operating profit or build continuously toward a profitable enterprise.
Mitigation	The process of rectifying an impact by repairing, rehabilitating or restoring the affected environment, or the process of compensating for the impact by replacing or providing substitute resources or environments.
Monitoring	Observing the change in geophysical, hydrogeological or geochemical measurements over time. Process intended to assess or to determine the actual value and the variations of an emission or another parameter, based on procedures of systematic, periodic or spot surveillance, inspection, sampling and measurement or another assessment

TERM	MEANING
	methods intended to provide information about emitted quantities and/or trends for emitted pollutants.
Naturally Revegetate or Natural Revegetation	For the purposes of the Mary River Project natural revegetation will include regrading and covering with overburden as required and allowing the surrounding natural vegetation to encroach and be re-established on the disturbed area.
Neutralization	Raising the pH of acidic solutions or lowering the pH of alkaline solutions to near-neutral pH (about pH 7) values through a reaction in which the hydrogen ion of an acid and the hydroxyl ion of a base combine to form water.
Neutralization Potential (NP)	General term for a sample's or a material's capacity to neutralize acidity.
Objectives	Objectives describe what the reclamation activities are aiming to achieve. The goal of mine closure is to achieve the long-term objectives that are selected for the site.
Open Pit Mining	Mining operation takes place on the surface. Mining operation and environment are in contact over an extended area.
Operator	Any natural or legal person that is responsible for the control, operation, and maintenance of the mine, mineral processing plant, tailings dam and/or related facilities including the after-closure phases.
Ore	Mineral or variety of accumulated minerals of sufficient value as to quality and quantity that it/they may be mined at a profit. Most ores are mixtures of extractable minerals and extraneous rocky material.
Orebody (mineral deposit)	Naturally occurring geological structure consisting of an accumulation of a desired mineral and waste-rock, from which the mineral can be extracted, at a profit, or with a reasonable expectation thereof.
Overburden	Layer of natural grown soil or massive rock on top of an orebody. In case of open pit mining operations it has to be removed prior to extraction of the ore
P	
Passive Treatment	Treatment technologies that can function with little or no maintenance over long periods of time.
Permafrost	Ground that remains at or below zero degrees Celsius for a minimum of two consecutive years.
Permafrost Aggradation	A naturally or artificially caused increase in the thickness and/or area extent of permafrost.
Permeability	The ease with which gases, liquids, or plant roots penetrate or pass through soil or a layer of soil. The rate of permeability depends upon the composition of the soil.
Phreatic Surface	The term phreatic is used in Earth sciences to refer to matters relating to ground water below the water table (the word originates from the Greek phrear, phreat-meaning "well" or "spring"). The term 'phreatic surface' indicates the location where the pore water pressure is under atmospheric conditions (i.e. the pressure head is zero). This surface normally coincides with the water table.
Potentially Acid Generating (PAG)	Rock or overburden material that has the potential to produce acidity irrespective of its effect on the adjacent pore water or whether the material is net acid producing or neutralizing.
Progressive Reclamation	Actions that can be taken during mining operations before permanent closure, to

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	take advantage of cost and operating efficiencies by using the resources available from mine operations to reduce the overall reclamation costs incurred. It enhances environmental protection and shortens the timeframe for achieving the reclamation objectives and goals.
Primary Crushing	Process of reducing ore into smaller fragments to prepare it for further processing and/or so that it can be transported to the processing plant. In underground mines, the primary crusher is often located underground, or at the entrance to the processing plant.
Quarry	Whole area under the control of an operator carrying out any activity involved in the prospecting, extraction, treatment and storage of minerals, including common related infrastructures and waste management activities, being not a mine. It is distinguished from a mine because it is usually open at the top and front, and used for the extraction of building stone, such as slate, limestone, gravel and sand.
Reclamation	The process of returning a disturbed site to its natural state or one for other productive uses that prevents or minimizes any adverse effects on the environment or threats to human health and safety.
Rehabilitation	Activities to ensure that the land will be returned to a form and productivity in conformity with a prior land use plan, including a stable ecological state that does not contribute substantially to environmental deterioration and is consistent with surrounding aesthetic values.
Remediation	The removal, reduction, or neutralization of substances, wastes or hazardous material from a site in order to prevent or minimize any adverse effects on the environment and public safety now or in the future.
Restoration	The renewing, repairing, cleaning-up, remediation or other management of soil, groundwater or sediment so that its functions and qualities are comparable to those of its original, unaltered state.
Revegetation	Replacing original ground cover following a disturbance to the land.
Risk Assessment	Reviewing risk analysis and options for a given site, component or condition. Risk assessments consider factors such as risk acceptability, public perception of risk, socio-economic impacts, benefits, and technical feasibility. It forms the basis for risk management.
Run-of-mine (ROM)	Run of mine. Unprocessed conveyed material (ore) from the mining operation.
Runoff	Part of precipitation and snowmelt that does not infiltrate but moves as overland flow and drains off the land into bodies of water.
Scarification	Seedbed preparation to make a site more amenable to plant growth.
Screening	Separating material into size fractions.
Security Deposit	Funds held by the Crown or designated owner of the land that can be used in the case of abandonment of an undertaking to reclaim the site, or carry out any ongoing measures that may remain to be taken after the abandonment of the undertaking.
Sediment	Solid material, both mineral and organic, that has been moved by air, water, gravity, or ice and has come to rest on the earth's surface either above or below sea level.
Seismic	Relating to an earthquake or to other tremors of the Earth, such as those caused by

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	large explosions.
Solubility	Quantity of solute that dissolves in a given volume and type of solvent, at given temperature and pressure, to form a saturated solution. The degree to which compounds are soluble depends on their ability, and that of the other dissolved species, to form ions and aqueous complexes in a particular drainage chemistry.
Sump	An underground catch basin in a mine where water accumulates before being pumped to the surface.
Supernatant	The clear liquid that floats about the sediment or precipitate.
Surface Water	Natural water bodies such as river, streams, brooks, ponds and lakes, as well as artificial watercourses, such as irrigation, industrial and navigational canals, in direct contact with the atmosphere.
Sustainable Development	Industrial development that does not detract from the potential of the natural environment to ensure benefits for future generations.
Tailings	Material rejected from a mill after most of the recoverable valuable minerals have been extracted.
Taliks	Unfrozen zones that can exist within, below, or above permafrost layers. They are usually located below deep water bodies.
Temporary Closure	When a mine ceases operations with the intent to resume mining activities in the future. Temporary closures can last for a period of weeks, or for several years, based on economical, environmental, political, or social factors.
Thermokarst	A landscape characterized by shallow pits and depressions caused by selective thawing of ground ice, or permafrost.
Topsoil	Natural huminous layer on top of the orebody, which has to be stripped prior to start-up of ore extraction.
Traditional Knowledge	A cumulative, collective body of knowledge, experience, and values built up by a group of people through generations of living in close contact with nature. It builds upon the historic experiences of a people and adapts to social, economic, environmental, spiritual and political change.
Ultramafic	Igneous rock composed chiefly of mafic minerals, e.g. monomineralic rocks composed of hypersthene, augite, or olivine.
Waste-rock, Discard, or Spoil Material	All rock materials, except ore and tailings that are produced as a result of mining operations.
Watershed	A region or area bordered by ridges of higher ground that drains into a particular watercourse or body of water.
Water Table	The level below where the ground is saturated with water.
Weathering	Processes by which particles, rocks and minerals are altered on exposure to surface temperature and pressure, and atmospheric agents such as air, water and biological activity.

14.2 Acronyms and Abbreviations

The following are acronyms or abbreviations that may be used in this document.

Abbreviation	Description
General	
A&R	Abandonment and Reclamation
Baffinland	Baffinland Iron Mines Corporation
CCME	Canadian Council of Ministers of the Environment
DEIS	Draft Environmental Impact Statement
EA	Environmental Assessment
	EHS Environmental Health and Safety
EIS	Environmental Impact Statement
EMMP	Environmental Mitigation and Monitoring Plans
FEIS	Final Environmental Impact Statement
	HADD Harmful Alteration, Disruption, or Destruction
	HTA/HTO Hamlets, Hunters, and Trappers Association/Organization
HTO	Hunters and Trappers Organization
IIBA	Inuit Impact and Benefits Agreement
IOL	Inuit Owned Lands
IQ	Inuit Qaujimajatuqangit (Inuit knowledge, or traditional knowledge)
KI	Key Indicator
LAC	Land Advisory Committee
LSA	Local Study Area
Mary River	Nuluujaak
MDAG	Mineral Development Advisory Group
MERA	Mineral and Energy Resource Assessment
MOU	Memorandum of Understanding
Mt/a	Million Tonne-Per-Annum
NLCA	Nunavut Land Claims Agreement
NSA	Nunavut Settlement Area
PDA	Potential Development Area
PDW	Pre-Development Works
PLA	Production Lease Area
PPR	Personal Property Registry
RA(s)	Responsible Authority(ies)
RMO	Resource Management Officer
RSA	Regional Study Area
TC-NWPP	Transport Canada Navigable Waters Protection Program
the Project	Mary River Project
TK	Traditional Knowledge
VC	Valued Component
VEC	Valued Ecosystem Component

Abbreviation	Description
VSEC	Valued Socio-Economic Component
FEDERAL AND TERRITORIAL ACTS	
AWPPA	Arctic Waters Pollution Prevention Act
BCANU	Business Corporations Act (Nunavut)
CEAA	Canadian Environmental Assessment Act
CEPA	Canadian Environmental Protection Act, 1999
CLA	Commissioner's Land Act
CNPA	Canada National Parks Act
CWA	Canada Wildlife Act
EG&GANU	Engineers, Geologists and Geophysicists Act (Nunavut)
EMAANU	Emergency Medical Aid Act (Nunavut)
EPANU	Environmental Protection Act (Nunavut)
EUANU	Explosives Use Act (Nunavut)
EXA	Explosives Act
FA	Fisheries Act
FPANU	Fire Prevention Act (Nunavut)
LSANU	Labour Standards Act (Nunavut)
MBCA	Migratory Birds Convention Act, 1994
MH&SANU	Mine Health and Safety Act (Nunavut)
NW&NSRTA	Nunavut Waters and Nunavut Surface Rights Tribunal Act
PHANU	Public Health Act (Nunavut)
TDGA	Transportation of Dangerous Goods Act, 1992
TDGANU	Transportation of Dangerous Goods Act (Nunavut)
TLA	Territorial Lands Act
TPANU	Territorial Parks Act (Nunavut)
WANU	Wildlife Act (Nunavut)
WCANU	Workers' Compensation Act (Nunavut)
FEDERAL AND TERRITORIAL REGULATIONS	
AWPPR	Arctic Waters Pollution Prevention Regulations
CFAEAP&R	Regulations Respecting the Coordination by Federal Authorities of Environmental Assessment Procedures and Requirements
CLR	Commissioner's Land Regulations
CMR	Canada Mining Regulations
CRFR	AECB Cost Recovery Fees Regulations, 1996
CSLR	Comprehensive Study List Regulations
CSLRNU	Comprehensive Study List Regulations (Nunavut)
CSRNU	Camp Sanitation Regulations (Nunavut)
ELR	Exclusion List Regulations
EURNU	Explosives Use Regulations (Nunavut)
EXR	Explosives Regulations
FPRNU	Fire Prevention Regulations (Nunavut)

Abbreviation	Description
ILR	Inclusion List Regulations
LLR	Law List Regulations
MBSR	Migratory Bird Sanctuary Regulations
MH&SRNU	Mine Health and Safety Regulations (Nunavut)
MMER	Metal Mining Effluent Regulations
NA&PSR	Nunavut Archaeological and Palaeontological Sites Regulations
NBRLUP	North Baffin Regional Land Use Plan
NPWR	National Parks Wildlife Regulations
NWTFR	Northwest Territories Fishery Regulations
NWTWR	Northwest Territories Waters Regulations
PCSRNU	Propane Cylinder Storage Regulations (Nunavut)
SCP&RRNU	Spill Contingency Planning and Reporting Regulations (Nunavut)
TDGR	Transportation of Dangerous Goods Regulations
TDGRNU	Transportation of Dangerous Goods Regulations (Nunavut)
TDR	Territorial Dredging Regulations
TLR	Territorial Lands Regulations
TLUR	Territorial Land Use Regulations
TPRNU	Territorial Parks Regulations (Nunavut)
TQR	Territorial Quarrying Regulations
WAR	Wildlife Area Regulations
WCRNU	Workers' Compensation Regulations (Nunavut)
WSRNU	Wildlife Sanctuaries Regulations (Nunavut)
FEDERAL GOVERNMENT DEPARTMENTS AND AGENCIES	
AANDC	Aboriginal Affairs and Northern Development Canada
CTA	Canadian Transportation Agency
DFO	Fisheries and Oceans Canada
DOJ	Department of Justice Canada
EC	Environment Canada
INAC	Indian and Northern Affairs Canada (recently renamed Aboriginal Affairs and Northern Development Canada)
NRCan	Natural Resources Canada
PCH	Parks Canada Agency (Canadian Heritage)
TC	Transport Canada
TERRITORIAL GOVERNMENT DEPARTMENTS AND AGENCIES	
CGSNU	Department of Community and Government Services
CLEYNU	Department of Culture, Language, Elders and Youth
DOJNU	Department of Justice
DOENU	Department of Environment
ED&TNU	Economic Development & Transportation
GN	Government of Nunavut

Abbreviation	Description
H&SSNU	Department of Health and Social Services
WCBNU	Workers' Compensation Board of the Northwest Territories and Nunavut
INSTITUTIONS OF PUBLIC GOVERNMENT	
CLARC	Community Land and Resource Committee
CLO	Community Liaison Officer
IPGs	Institutions of Public Government
NIRB	Nunavut Impact Review Board
NPC	Nunavut Planning Commission
NSRT	Nunavut Surface Rights Tribunal
NWB	Nunavut Water Board
NWMB	Nunavut Wildlife Management Board
INUIT ORGANIZATIONS	
DIO	Designated Inuit Organizations
MHTO	Mittimatalik Hunters and Trappers Organization
NTI	Nunavut Tunngavik Incorporated
QIA	Qikiqtani Inuit Association
RIA	Regional Inuit Association
RWO	Regional Wildlife Organization

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